ALL COURSES (& EXAMS) + CASES (& DILEMMA DISCUSSIONS) + SANCTIONS (& DISCIPLINARY ACTIONS)

LEARNING PLATFORM

TRADE COMPLIANCE & SURVEILLANCE

TRAINING FOR PROFESSIONALS IN THE COMMODITY & ENERGY MARKETS

ONLINE CURRICULUM

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ONLINE CURRICULUM

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BEST PARTNER FOR A COMPETENT & COMPLIANT WORKFORCE



THE ONLINE LEARNING ENVIRONMENT

TRAINING COURSES & THEIR MODULES

CONTENT & INTENSITY

COVERAGE BY VIDEO LESSONS AND OTHER STUDY MATERIALS
- ALL INCLUDING EXAMINATION & CERTIFICATION

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MISCONDUCT AT WORK - Online training courses

In the field of "Misconduct at Work" we have developed and maintain the following training courses, which are suitable for any professional:

- 1. Concepts Conduct versus misconduct
- 2. Concepts Morality, ethics & integrity
- 3. Ethics in the workplace Discrimination
- 4. Ethics in the workplace Harassment
- 5. Ethics in the workplace Sexual Intimidation
- 6. Governance Conflicts of interest
- 7. Governance Rules & codes
- 8. Governance KYC
- 9. Governance Whistleblowing
- **10. Governance Non-retaliation**
- 11. Culture Corporate climate
- 12. Culture Remuneration

> Target groups: Any type of organisation, commercial or non-commercial, including

banks, exchanges, clearing organisations, trading companies & brokers.

Learning advice: Courses of relevance

Exams: Multiple choice (structure: A-B, reflecting "True" or "False").

Structure: Random selection of questions from database.

Passing rate: Minimum required score: 75%.

Maximum attempts: Four (4) attempts, being the initial exam plus three (3) re-takes.

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TRAINING COURSE 1: CONCEPTS - CONDUCT VERSUS MISCONDUCT

This training covers the concept 'conduct' and sets out what it concerns. It touches on the basics of conduct and misconduct. Examples of misbehavior are provided and it is explained what consequences misconduct can have.

This training includes the following topics:

- Conduct
 - o What does it concern?
 - o Explanation of the concept
- Misconduct at work
 - o Examples
 - o Listing of different types of misconduct
- Behaviour versus misbehaviour
 - o Often a clear distinction
 - Sometimes a thin line
- Consequences of misconduct
 - o Personal
 - o Organisation
- Conduct risk management
 - Conduct
 - Conduct risk
 - o Conduct risk management

Level: Basic No prerequisitesIntensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 2: CONCEPTS - MORALITY, ETHICS & INTEGRITY

This training covers the concept 'morality'. It touches on the basics of ethics and integrity. During the training course it is explained what a moral dilemmas is and how one can encounter it. Furthermore, it is explained what .

This training includes the following topics:

- Morality
 - o What is it?
 - Moral dilemmas
 - Moral cognition
- Ethics
 - o What does it concern?
 - o Types
 - Normative ethics
 - Descriptive ethics
- Integrity
 - o What is it?
 - o Binary state or dimension?
 - Subjective or objective concept?
- Types of evil
 - o Natural evil
 - Social evil
 - o Moral evil

❖ Level: Basic No prerequisites❖ Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 3: ETHICS IN THE WORKPLACE - DISCRIMINATION

This training covers the fundamentals of discrimination. It includes both negative and positive discimination. During the course various types of discrimination are described; examples are provided of various types of inequality.

This training includes the following topics:

- Human rights
 - o Respect
 - o Enforcement by law
- A hostile work environment
 - Inequality
 - o Improper judgement
 - Disrespect
 - Lack of dignity
- Embracing diversity
 - o Individual versus group
 - o Everyone is unique
- Forms of discrimination
 - o Ethnical
 - o Religious
 - o Gender
 - o Age
- Social consequences
 - o Fear
 - o Unhappy
 - Social isolation
- Positive discrimination
 - o Sounds better, but also a form of misconduct
 - o Examples of positive discrimination

❖ Level: Basic No prerequisites❖ Intensity: 25 minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 4: ETHICS IN THE WORKPLACE - HARASSMENT

This training covers the fundamentals of harassment. It touches on the basics of the topic. Forms of harassment are set out in a nutshell and it is explained what the consequences of this form of misconduct can be.

This training includes the following topics:

- Harassment
 - o What does it concern?
 - Psychological hazzards
 - o Depreciation
 - Detraction
 - Minifying
 - Overbearing supervision
 - o Overkill of criticism
- Bullying
 - Mistreatment by colleague(s)
- Cyberbullying
 - o Email
 - Social media
- Victims
 - Stress
 - o Health problems
 - Feeling unsafe
 - Mentally
 - o Physically

Level: Basic No prerequisitesIntensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 5: ETHICS IN THE WORKPLACE - SEXUAL INTIMIDATION

This training covers the fundamentals of intimidation in the broadest sense, and sexual intimidation in particular. It sets out how a position of power can be abused and why this should not take place. Examples are provided to make it clear which kind of behavior is unacceptable and what criteria are of relevance.

This training includes the following topics:

- Intimidation
 - Mental pressure
 - o Mental manipulation
- Sexual intimidation
 - Sexual harassment
- Abuse of power
 - o Role differential
 - o A position of power
 - o Abusing a situation
 - Colleague
 - Co-worker
 - Manager
 - o Management by fear
- Types of sexual misconduct
 - Purchase of sexual services
- Types of sexual intimidation
 - o Verbally, visually and physically
 - Stalking

Level: Basic No prerequisites

Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 6: GOVERNANCE – CONFLICTS OF INTERESTS

This training covers conflicts of interests. It touches on the basics of the theme and, hence, it includes why conflicts of interest appear and how they should be managed. The training course goes over moral dilemmas and clarifies that moral dilemmas cannot always be avoided; they simply arise due to complexity and opposing interests.

This training includes the following topics:

- Interests
 - o Primary interests
 - Secundary interests
- Conflicts of interests
 - o Interests
 - Responsibilities
 - Loyalties
- Moral dilemmas
 - Practical cases
 - Ethical debates
 - o By nature
- Handling moral dilemmas
 - o Interpretation
 - o Considering circumstances
 - o Practical application

Level: Basic No prerequisitesIntensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 7: GOVERNANCE - RULES & CODES

This training covers internal procedures and corporate codes of conduct. It touches on the basic elements of corporate rules and sets out why these are in place. Therefore, it is also explained what the objectives of a code of conduct are.

This training includes the following topics:

- Business integrity
 - o Safeguarding the organisations
 - o Protection against crooks
- Internal procedures
 - Sign for having taken notice
 - Confirm awareness
- Code of conduct
 - o Rules of engagement
 - Responsibilities
 - Accountability
- Effectiveness
 - o Corporate action against violations is required
 - o Trust & confidence
 - o Continuous improvement
 - o Training to create awareness

Level: Basic No prerequisites
 Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 8: GOVERNANCE - KYC

This training covers the know-your-customer (KYC) principle. It is explained why it is important and how organisations could embed it in their daily operations. During the training course, reference is made to regulations which require organisations to install KYC procedures.

This training includes the following topics:

- Customer protection
 - o Protecting customers
 - o Protecting consumers
 - Protecting investors
- Advice / Advise
 - Independent
 - o Objectivity & honesty
- Fraud & crime
 - Protect yourself
 - o Compliance with regulations
- Due diligence
 - o Analysis
 - o Getting to know who you are dealing with
- Customer
 - Other stakeholders
 - Counterparty

Level: Basic No prerequisites
 Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 9: GOVERNANCE - WHISTLEBLOWING POLICY

This training covers the fundamentals of whistleblowing. It touches on the basics of the related topics or themes. The consequences of whistleblowing are set out in a nutshell and it is explained what organisation can do to stimulate employees to dare to speak out and mention misconduct.

This training includes the following topics:

- Whistleblowing
 - o Insiders disclosing misconduct
 - Outsiders disclosing misconduct
- Protection
 - o Whistleblowers expose themselves to criticism
 - o Protection against the people which have performed misconduct
- Rewarding
 - o Authorities
 - Paying whistleblowers
- Whistleblowing policy
 - o Where?
 - > Online portal on corporate website
 - o How?
 - Guarantee confidentiality
 - > Assure anonymity

 ❖ Level:
 Basic
 No prerequisites

 ❖ Intensity:
 25 minutes
 Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 10: GOVERNANCE - NON-RETALIATION POLICY

This training covers what retaliation concerns and shows the implications of it. The training also sets out what kind of retaliation could take place and how organisations should manage their employees. It is set out how a non-retaliation policy should look like.

This training includes the following topics:

- Retaliation
 - The basic concepts
 - Characteristics
- Examples of retaliation
 - Downgraded appraisel
 - o Reduction of compensation
 - o Exclusion from meetings or other events
 - o Degradation
 - o Hindering and blocking promotion
 - Firing someone
- Non-retaliation policy
 - o Protecting employees
 - o Rewarding whistleblowers
- Regulations
 - o The US No Fear Act
 - o The US Whistleblowing Protection Enhancement Act

Level: Basic No prerequisites
 Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 11: CULTURE - CORPORATE CLIMATE

This training sets out in what respect a corporate culture impacts the behavior of individuals. It is explained that culture creates the context in which one's decisions are made and one's actions take place.

This training includes the following topics:

- Conduct failings
 - Good culture
 - Bad culture
- Culture
 - o What is it?
- The decision-making process
 - o Content versus context
 - Ration versus emotions
- Behaviour
 - Culture sets context
 - Environmental factors
- Complexity
 - o Homogeneous society versus heterogeneous society
 - o Complexisation of the corporate world
 - ➤ Globalisation
 - Diversity

❖ Level: Basic No prerequisites

Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 12: CULTURE - REMUNERATION

This training covers the possible consequences of incentives. It touches on the basics of the related topics or themes. Bonus structures are set out in a nutshell and it is explained which non-financial incentives could be applied by an organisation's management.

This training includes the following topics:

- Moral development
 - Moral stretching
- Targets
 - o Realistic versus unrealistic
 - Quantified targets versus
 - o Financial targets versus non-financial targets
- Performance-linked pay
 - Stocks
 - Stock options
 - o Bonus structure
 - > Financial rewards
 - Other motivators
 - Non-financial aspects
- Motivations
 - Compliments
 - Praise
 - o Attention from the highest management
 - o Recognition

Level: Basic No prerequisites
 Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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SENIOR MANAGERS AND CERIFICATION REGIME - Online training courses

In the field of "SM&CR" we have developed and maintain the following training courses, which are suitable for various target groups:

- 1. Background & Scope
- 2. Conduct Rules
- 3. Certification Regime
- 4. Senior Managers Regime

> Target group 1: Non-Ancillary staff

Learning advice: Course 1-2

> Target group 2: Significant Harm Functions + Material Risk Takers

Learning advice: Course 1-3

> Target group 3: Senior Managers

Learning advice: Course 1-4

Exams: Multiple choice (structure: A-B, reflecting "True" or "False").

Structure: Random selection of questions from database.

Passing rate: Minimum required score: 75%.

Maximum attempts: Four (4) attempts, being the initial exam plus three (3) re-takes.

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TRAINING COURSE 1: BACKGROUND & SCOPE

This training covers an introduction to the Senior Managers and Certification Regime (SM&CR). It touches on the basics of the package and sets out which authorities play a role in this field. The reasons for the introduction of SM&CR is covered, while explaining its objectives.

This training includes the following topics:

- Background
 - Conduct failings
 - o Parliamentary Commission for Banking Standards (PCBS)
- Supervision
 - o Financial Conduct Authority (FCA)
 - o Prudential Regulation Authority (PRA)
- Accountability framework
 - o Objectives
 - Conduct
 - o Competence
- Scope
 - o Banks
 - o Insurers
 - o Solo-regulated firms
 - o FSMA authorised firms

Level: Basic No prerequisites
 Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 2: CONDUCT RULES

This training covers the fundamentals of the Conduct Rules, which are part of the Senior Managers and Certification Regime (SM&CR). During the course it is explained what types of Conduct Rules there are and to which professionals these apply.

This training includes the following topics:

- Who?
 - Senior Managers
 - Certified Person
 - o All non-ancillary staff
- Code of conduct
 - o Cocon
- Reporting of breaches
 - o FCA
 - o PRA
- Conduct rules
 - o Tier 1 rules
 - o Tier 2 rules
- Taking responsibility
 - o Risk culture
 - o Risk governance

Level: Basic No prerequisitesIntensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 3: CERTIFICATION REGIME

This training touches on the basics of the Certification Regime. In this course it is explained what this regime is about and to whom it applies. Attention is given to the role firms in scope have to perform and how to organise this.

This training includes the following topics:

- Roles
 - Significant Harm Functions
 - Material Risk Takers
- Certification
 - o Certifying that employees are 'fit and proper'
 - Certification functions
- Risk of significant harm to:
 - o The firm
 - Its reputation
 - Its customers
- How, when & what?
 - o Annual certification
- Relevant aspects
 - Qualification
 - Training
 - o Competence
 - Personal characteristics

Level: Basic No prerequisitesIntensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 4: SENIOR MANAGERS REGIME

This training covers the fundamentals of the Senior Managers Regime (SMR). In the course it is set out which Senior Manager Functions there are. Attention is also given to Regulator Approval, Prescribed Responsibilities, Statements of Responsibilities and the Responsibilities Map.

This training includes the following topics:

- Senior Managers
 - Direct accountability
 - o Important decisions
- Senior Management Functions
 - o Which roles?
 - o Which functions?
 - o 19 functions
 - o Company-specific use and allocation
- Regulator approval
 - Key functions
 - o Before formal appointment
- Organisation
 - o Prescribed Responsibilities
 - o Statement of Responsibilities
 - o Responsibilities Map

Level: Basic No prerequisites
 Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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DATA PROTECTION – Online training course

In the field of "Data Protection" we have developed and maintain the following training course, which are suitable for any professional:

1. Data Protection & Privacy

> Target groups: Any type of organisation, commercial or non-commercial, including

banks, exchanges, clearing organisations, trading companies & brokers.

Learning advice: Courses of relevance

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eLEARNING: DATA PROTECTION & PRIVACY

This training covers the basic aspects of data protection and privacy via regulatory packages. It addresses the rights of individuals and the obligations of organisations and their employers.

This training covers the following topics:

- Personal data
 - o Provisions and requirements related to the processing of personal data
 - Control over personal data
- Relevant roles
 - o Controllers of personal data
 - o Processors of personal data
- Rights for civilians
 - o Transparency and modalities
 - o Information and access
 - o Rectification and erasure
 - o Objection and automated decisions
- Obligations for organisations & their employees
 - o Technical measures
 - o Organisational measures
 - o Safeguards to protect personal data
 - o Pseudonymisation
 - Records of processing activities
 - o Data Protection Officer
- Non-compliance
 - o Breaches of the regulation
 - o Remedies
 - o Reporting data leakage to involved parties and authorities
 - Sanctions

❖ Level: Basic - No prerequisites

Intensity: 25 minutes

❖ Language: Voice & text - English

Exam: No examination, nor certification

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FINANCIAL CRIME – Online training courses

In the field of "Financial Crime" we have developed and maintain the following training courses, which are suitable for various target groups:

- 1. Introduction to financial crime
- 2. Money laundering
- 3. Terrorist financing
- 4. Bribery
- 5. Financial fraud
- 6. Tax fraud
- 7. Employee fraud
- 8. Market abuse

> Target groups: Employees of bank, exchange, clearing company, trading firm, broker.

Learning advice: Courses of relevance

Exams: Multiple choice (structure: A-B, reflecting "True" or "False").

Structure: Random selection of questions from database.

Passing rate: Minimum required score: 75%.

Maximum attempts: Four (4) attempts, being the initial exam plus three (3) re-takes.

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TRAINING COURSE 1: INTRODUCTION TO FINANCIAL CRIME

This training covers the fundamentals of financial crime. It touches on the features of characteristics of financial crime and raises attention for the consequences of these practices. The course highlights role of corporate governance and crime management.

This training includes the following topics:

- The basic characteristics of financial crime
 - o Types of financial crime
 - o The consequences of financial crime
- Sanctioning
 - o Administrative sanctions
 - o Criminal sanction
- Crime management
 - o Prevention & detection
 - Monitoring & surveillance
 - o Supervision
 - o Crime fighters
- Governance
 - o The role of management
 - o The role of the compliance department

Level: Basic No prerequisites
 Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 2: MONEY LAUNDERING

This training covers the fundamentals of money laundering. It touches on the basics of the related topics or themes. The three basic steps in the laundering process are set out in a nutshell and it is explained what roles various parties could play.

This training includes the following topics:

- Money laundering
 - o What is it?
- Steps in the laundering process
 - o Placement
 - Layering
 - o Integration
- Anti-money laundering
 - o AML policy
- Money transfers
 - o International transfers
 - Series of transfers
 - o Based on invoicing
- Attention required
 - o Banks
 - o Intermediaries
 - Market participants
- Indicators to detect money laundering
 - List of examples

❖ Level: Basic No prerequisites

Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 3: TERRORIST FINANCING

This training covers the fundamentals of terrorist financing. It touches on the relationship with money laundering and sets out various international crime fighting initiatives. During this course it is also explained what differences there are in the organisation of money laundering and terrorist financing.

This training includes the following topics:

- Terrorist financing
 - o What is it?
- Financing
 - Legitimate sources
 - o Illegal sources
- Anti-terrorist financing
 - ATF policy
- Terrorist financing and money laundering
 - o In conjunction
 - o Differentials
- Checks & balances
- Operations at risk
- Fighting terrorist financing
 - o Financial Action Task Force (FATF)
 - o Terrorist Finance Tracking Program (TFTP).
 - Patriot Act
- Indicators to detect terrorist financing
 - List of examples

Level: No prerequisites Basic

Intensity: 25 minutes **Excluding examination**

Language: Voice & text **English**

Including: Examination Certification upon passing

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TRAINING COURSE 4: BRIBERY & CORRUPTION

This training covers the fundamentals of corruption. The course touches on the basics of the related topics or themes, including bribery. Various relating policies and regulations are set out in a nutshell and it is explained what roles certain organisations in this field have.

This training includes the following topics:

- Bribery
 - o What is it?
- Corruption
 - o What is it?
- Anti-bribery & corruption
 - ABC policy
 - o OECD Anti-Bribery Convention
 - US Foreign Corrupt Practices Act
 - UK Bribery Act
- Bribery versus extorsion
 - o Similarities & differentials
 - Coercion
 - o Offender & victim
- The concept of reciprocity
 - o What does it imply?
 - o Inequity aversion
- Gifts
 - o Code of conduct

Level: Basic No prerequisitesIntensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 5: FINANCIAL FRAUD & SCAMS

This training covers the fundamentals of financial fraud. Attention is given to identity theft, as one of the forms of financial fraud, like cybercrime and other scams. In this course numerous examples are provided.

This training includes the following topics:

- Fraud
 - o What is it?
 - Legal definition(s)
- Examples of fraud
 - Listing
- Identity theft
 - o Assumption of another person's identity
 - o Examples of identity theft
 - Money mules
 - o Trojans
 - Account takeover
 - Application fraud
 - o Phising
 - o Overtaking identifying information
- Internet fraud
 - o Cybercrime
- Fraudsters contacting victims
 - Methods

Level: Basic No prerequisites
 Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 6: TAX EVASION & TAX FRAUD

This training covers the fundamentals of tax evasion and tax fraud. The course sets out the differentials between tax evasion and tax avoidance and touches on the basics of the related topics or themes. This training also given attention to tax fraud and goes into depth on a specific form of tax fraud, VAT fraud.

This training includes the following topics:

- Tax evasion
 - o What is it?
- Tax evasion versus tax avoidance
 - o Similarities and differentials
 - o Responsible, aggressive or abusive tax avoidance
- Tax fraud
 - o What is it?
- Types of tax fraud
 - VAT fraud
 - o Example of VAT fraud: fraud in the traded markets
- Tax fraud schemes
 - o Acquisition fraud
 - Carousel fraud

Level: Basic No prerequisites
 Intensity: 25 minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 7: EMPLOYEE FRAUD

This training covers the fundamentals of fraud by an employee of the company. It touches on the basics of the related topics or themes. Internal fraud is set out in a nutshell and it is explained what types of employee fraud there are, as well as how this can be identified.

This training includes the following topics:

- Employee fraud
 - o What does it concern?
- Examples of employee fraud
 - Listing
 - Wire fraud
 - > Embezzlement
 - > Fraudulent documents
- Consequences
 - o In-company
 - Externally
- Control
 - o Checks & balances
 - o Front, middle and back office activities
- Indicators to detect employee fraud
 - o List of examples

❖ Level: Basic No prerequisites❖ Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 8: MARKET ABUSE

This training covers the fundamentals of market abuse. It touches on the basics of the related topics or themes. The course sets out in a nutshell what insider trading and market manipulation concern. And it is explained why market integrity is important.

This training includes the following topics:

- Market abuse
 - Market integrity
 - o Protecting investors and consumers, plus other market participants
 - o Prohibition of insider trading
 - o Prohibition of market manipulation
- Inside information
 - o Criteria to be met in order to qualify information as inside information
 - o Obligation to publish inside information
- Insider trading
 - o Trading on the basis of inside information
 - o Unlawful or improper disclosure of inside information
 - o Recommending or inciting others to insider trading
- Manipulation of markets
 - Categories
 - o Schemes
- Supervision
 - Authorities
- Sanctioning
 - Adminstrative
 - o Criminal

Level: Basic No prerequisites
 Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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MARKET ABUSE - Online training courses

In the field of "Market Abuse" we have developed and maintain numerous training courses; see hereafter.

Exams: Multiple choice (structure: A-B, reflecting "True" or "False").

Structure: Random selection of questions from database.

Passing rate: Minimum required score: 75%.

Maximum attempts: Four (4) attempts, being the initial exam plus three (3) re-takes.

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eLEARNING: MARKET ABUSE

GENERAL INTRODUCTION TO MARKET ABUSE

This *interactive* eLearning covers the fundamentals of market abuse. It touches on the basics of the related topics or themes from a *universal perspective* and is therefore suitable for every professional who wants or needs to master the related content.

This *interactive* eLearning covers the following topics:

- Market abuse
 - Insider trading
 - > Order management
 - Placing, cancelling & amending orders
 - Other
 - Inducing, inciting other people
 - o Market manipulation
 - Transacting/order management which is misleading
 - o Dissemination of false/misleading information
- Inside information
 - o Criteria to qualify information as inside information
 - o Obligation to publish inside information
- Compliance
 - o Risk of non-compliance
 - o Reputational risk
- Monitoring & surveillance
 - o Parties with an obligation to perform monitoring or surveillance
 - o Reporting suspicious behaviour
- Sanctioning
 - Administrative sanctions
 - Criminal sanctions

Level: Basic - No prerequisites

Intensity: 30 minutes

❖ Language: Voice & text - English

Exam: No examination, nor certification

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MARKET ABUSE (Singapore) - Online training courses

In the field of "Market Abuse" we have developed and maintain a variety of training courses with specific focus on Singaporese regulations; see hereafter.

Exams: Multiple choice (structure: A-B, reflecting "True" or "False").

Structure: Random selection of questions from database.

Passing rate: Minimum required score: 75%.

Maximum attempts: Four (4) attempts, being the initial exam plus three (3) re-takes.

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SECURITIES & FUTURES ACT

REGULATION

This course is about the Singaporese regulation on market abuse. The focus in on securities and futures markets in particular. Attention is given to the relevant authorities, their roles, jurisdictions and enforcement mandates.

This course includes the following video lessons:

- A
 A
 A
 A
 A
 A
 A
 A
 A
 - A. Examination
 - B. Certification

Level: Basic No prerequisites
 Intensity: XX minutes Excluding examination
 Language: Voice & text English
 Including: Examination Certification upon passing

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COMMODITY TRADING ACT

REGULATION

This course is about the Singaporese regulation on market abuse. The focus in on commodities and commodity markets. Attention is given to the relevant authorities, their roles, jurisdictions and enforcement mandates.

This course includes the following video lessons:

- A
 - A
- A
 - 0 A
- , **,** ,
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- ۰.۰
- A
- - A. Examination
 - B. Certification

❖ Level: Basic No prerequisites

❖ Intensity: XX minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing



MARKET ABUSE (US) – Online training courses

In the field of "Market Abuse" we have developed and maintain a variety of training courses with specific focus on United States regulations; see hereafter.

Exams: Multiple choice (structure: A-B, reflecting "True" or "False").

Structure: Random selection of questions from database.

Passing rate: Minimum required score: 75%.

Maximum attempts: Four (4) attempts, being the initial exam plus three (3) re-takes.

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US MARKET ABUSE REGULATIONS & AUTHORITIES

REGULATION

This course is about the US regulations on market abuse. The focus in on commodity & energy markets in particular. Attention is given to the relevant authorities, their roles, jurisdictions and enforcement mandates.

This course includes the following video lessons:

- 1. Overview of US market abuse regulations Commodity & energy markets
- 2. Authorities in US commodity & energy markets CFTC, FTC & FERC
- 3. Securities Exchange Commission (SEC)
- 4. Overlapping jurisdictions
- 5. Agreements between US agencies
 - A. Examination
 - B. Certification

❖ Level: Basic No prerequisites

Intensity: 15 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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CEA & DFA REGULATION

(DODD-FRANK-AMENDED) COMMODITY EXCHANGE ACT

This course is about the US regulation Commodity Exchange Act, as well as its refinements as directed per Dodd-Frank Act. The focus of this educational programme is on commodity markets. Attention is given to the prohibitions and obligations under this regime and how things are organised. Furthermore, actual cases are covered to include jurisprudence.

This course includes the following video lessons:

- 1. Introduction
- 2. The Dodd-Frank-amended CEA
- 3. Prohibition of insider trading
- 4. Prohibition of market manipulation
- 5. Disruptive practices
- 6. Scope of CEA
- 7. CFTC Final Rule 180.1 & 180.2
- 8. Sanctioning
- 9. Case law versus civil law
- 10. Jurisprudence
- 11. Market surveillance
 - A. Examination
 - B. Certification

❖ Level: Basic No prerequisites

Intensity: 20 minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing

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EPA REGULATION

ENERGY POLICY ACT

This course is about the US Energy Policy Act, with specific attention to market abuse. The focus in on energy markets in general and electricity and gas markets in particular. Attention is given to the relevant authorities. Furthermore, actual cases are covered to include jurisprudence.

This course includes the following video lessons:

- 1. Introduction
- 2. Scope & provisions
- 3. FERC Order 670
- 4. Jurisprudence
- 5. Market surveillance
 - A. Examination
 - B. Certification

Level: Basic No prerequisitesIntensity: 15 minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing

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EISA REGULATION

ENERGY INDEPENDENCE AND SECURITY ACT

This course is about the US regulation Energy Independence and Security Act. The focus is on market abuse in the field of energy markets in general and crude oil and refinery products in particular. Attention is given to the relevant authorities. Furthermore, actual cases are covered to include jurisprudence.

This course includes the following video lessons:

- 1. Introduction
- 2. Scope & provisions
- 3. FTC Petroleum Market Manipulation Rule
- 4. Jurisprudence
- 5. Market surveillance
 - A. Examination
 - B. Certification

Level: Basic No prerequisites
 Intensity: 15 minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing



MARKET ABUSE (EU) – Online training courses

In the field of "Market Abuse" we have developed and maintain a variety of training courses with specific focus on European Union regulations; see hereafter.

Exams: Multiple choice (structure: A-B, reflecting "True" or "False").

Structure: Random selection of questions from database.

Passing rate: Minimum required score: 75%.

Maximum attempts: Four (4) attempts, being the initial exam plus three (3) re-takes.

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TRAINING COURSE 1: EU REGULATIONS & INSTITUTIONS

This training covers the fundamentals of the legislative process in the European Union. It touches on the basics of the related topics or themes. EU regulations are set out in a nutshell and it is explained what institutions are relevant and what roles they have.

This training covers the following topics:

- Policy making & development of legislation
 - o Brussels: DG FISMA & DG ENER
 - o Institutions: EC, EP & The Council of the EU
- Stakeholders
 - Regulatory affairs
 - Lobbying & industry representatives
- Financial crime
 - o Money laundering, terrorist financing & tax fraud
 - Market abuse: MAR & REMIT
- Regulations & directives
 - Differences
- Dominant themes & relevant aspects
 - o Protection, transparency & integrity
 - o Prohibitions & obligations
- Compliance & risk management
 - o Compliance risk management
 - Reputational risk
- Supervision
 - o Competition authorities & their role
 - o ESMA & ACER & their role
 - NCAs & NRAs & their role

Level: Basic No prerequisites
 Intensity: 25 minutes Excluding examination
 Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 2: REMIT

This training covers the fundamentals of the regulation and its consequences. It touched on the basics of the related aspects and crucial elements.

The following topics are addressed:

- The background & objectives of REMIT
 - Integrity
 - Transparency
- The scope of this legislative package
 - o Electricity and gas
 - Electricity and gas contracts
 - Capacity
- Inside information
 - Physical capacity
 - o Criteria to qualify information as inside information
- The prohibitions under the regulation
 - Insider trading
 - Market manipulation
- The obligations under this regime
 - o Publication of inside information
 - Data collection/reporting
 - Registration
 - Market monitoring & surveillance (PPAT)
- The organisation of supervision
 - o The role of ACER and NRAs
- Sanctioning in case of non-compliance
 - o Administrative & criminal sanctions
 - o For companies & individuals

Level: Basic No prerequisites
 Intensity: 25 minutes Excluding examination
 Language: Voice & text English
 Including: Examination Certification upon passing

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TRAINING COURSE 3: MAR

This training covers the fundamentals of the regulation and its consequences. It touched on the basics of the related aspects and crucial elements.

This training covers the following topics:

- The background & objectives of MAR
 - o Financial market package
 - o MAD, MAD II & MAR
- Definitions
 - o EAMP
 - o PPAET
- The scope of this legislative package
 - o Financial instruments
 - o Commodities and commodity-related contracts
- The prohibitions under this regime
 - o Unlawfully disclosing inside information
 - Insider trading
 - o Market manipulation
- The obligations under the regulation
 - o Publication of inside information
 - Insider lists
 - o Market monitoring & surveillance
- The organisation of supervision
 - o The role of ESMA and NCAs
- Sanctioning in case of non-compliance
 - o Administrative & criminal sanctions
 - o For companies & individuals

❖ Level: Basic No prerequisites❖ Intensity: 25 minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 4: ETHICS & INTEGRITY

This training covers the fundamentals of the concepts 'ethics' and 'integrity'. It touched on the basics of behavior and related topics or themes.

This training covers the following topics:

- Behaviour
 - o Conduct vs. misconduct
 - Prohibition of abusive behaviours
- Compliance
 - Compliance function
 - o Code of conduct
- The concepts explained
 - o Ethics
 - Integrity
- Conflicts of interest
 - Morality
 - o Dilemmas: the grey zone
- Financial crime
 - o Money laundering, terrorist financing, tax fraud, employee fraud & market abuse
- Crime management
 - o Effectiveness
 - Segregation of duties
- Classifications
 - Religion and philosophy
 - o Natural evil, social evil & moral evil
- Trading behaviour
 - o Rationale vs. emotion
 - o Content vs. context
- Unethical decision making
 - o Dimonic dimension
 - o Complexity of today's society and markets

❖ Level: Basic No prerequisites❖ Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 5: COMMODITY VALUE CHAIN

This training covers the fundamentals of the 'commodity & energy value chain'. It touches on the basics of the physical flow of commodities. Attention is given to production, storage, transport and consumption and related capacities.

This training covers the following topics:

- The value chain
 - Physical flow
 - Security of supply
- Activities in the chain
 - o Production
 - Exploration & production of fossil fuels (extraction)
 - Power generation
 - Production facilities
 - Storage
 - Security of supply
 - Storage facilities
 - Storage system operators
 - Transport
 - Transport facilities
 - Transmission system operators
 - Balancing & the nomination process
 - Consumption
 - Consumption & consumption facilities
- Relevant terminology
 - o Upstream, midstream & downstream activities
- Pricing
 - o Availability of capacity as price driving factor
 - o Merit order
 - Weather circumstances

Level: Basic No prerequisites
 Intensity: 25 minutes Excluding examination
 Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 6: INSIDE INFORMATION

This training covers the fundamentals of 'inside information' under (various) market regulations. It touches on the definition and relevant criteria.

This training covers the following topics:

- Information vs. inside information
 - o Qualification
 - o Responsibility of professional
- Awareness of sensitivity
 - o Crucial information
 - Careful treatment
- Relevant criteria
 - o Product within scope of regulation
 - o Non-public information
 - o Precise information
 - o Likely to have a significant price impact
- Interpretation of criteria
 - o Product within scope of regulation
 - o Non-public information
 - o Precise information
 - o Likely to have a significant price impact
- Acting based on inside information
 - Market abuse

Level: Basic No prerequisitesIntensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 7: INSIDE INFORMATION UNDER REMIT

This training covers the fundamentals of 'inside information' under the REMIT regulation. It sets out how inside information has to be handled in energy markets.

This training covers the following topics:

- Definition of inside information under REMIT
 - o Definition
 - Physical capacity
- Obligation to publish inside information
 - o Why to publish?
 - o Who has to publish?
 - o What to publish?
 - o How to publish?
 - o Where to publish?
 - o When to publish?
- Exemptions
 - o Timing & order of acting
 - o Immediate physical loss
 - o National emergency
- Disclosure
 - Timely
 - Effective
- Urgent market message
 - o UMM

Level: Basic No prerequisites
 Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 8: INSIDE INFORMATION UNDER MAR

This training covers the fundamentals of 'inside information' under the MAR regulation. It sets out how inside information has to be handled in financial markets.

This training covers the following topics:

- Definition of inside information under MAR
 - o Definition
- Prohibition of unlawful disclosure of inside information
- Obligation to publish inside information
 - o Why to publish?
 - o Who has to publish?
 - o What to publish
 - o How to publish?
 - o Where to publish?
 - o When to publish?
- Disclosure
 - o Platform
- Issuer
 - o Obligation to publish inside information
- EAMP
 - o Emission allowances market participant
 - o Obligation to publish inside information
- Inciting, aiding & abetting
- Legitimate behaviour

Level: Basic No prerequisites
 Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 9: INSIDER TRADING & MARKET MANIPULATION

This training covers the fundamentals of 'market abuse'. It touches on the basics of insider trading and market manipulation.

This training covers the following topics:

- The prohibition of insider trading
 - o Unlawful disclosure of inside information
 - o Recommendations & inducements
 - o Front running
- The prohibition of market manipulation
 - o Categories of manipulation
 - o Types of manipulation
- Prevention & detection of market abuse
 - o PPA(E)T
 - o ST(O)R
- Prevention & detection of market abuse requires understanding content & context
 - o Applicable for professionals in a market access function
 - o Applicable for professionals in a monitoring & surveillance function

Level: Basic No prerequisitesIntensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 10: MARKETS & TRADING

This training covers the fundamentals of 'markets' and 'trading'. It touches on the basics of market working and covers the types of markets. Included are the basics of deal making and transacting.

This training covers the following topics:

- What is a market?
 - o Buyers & sellers: suppliers & consumers, plus others
 - o Spot vs. forward
- Organisation of markets, products, pricing & trading
 - o Standard vs. Non-standard products
 - o Bilateral deals Master agreement (legal framework for non-commercial terms)
- Types of markets
 - o Balancing markets, spot markets ((W)IDM, DAM) & forward markets
 - Auction & continuous market
- Comparison: Commodity markets vs. Financial markets
- Venues
 - o On-venue & off-venue OTC markets vs. exchange trading
 - Counterparty risk management Collateralisation & Margining
 - Exchange rulebooks
- Transacting
 - Deal making
 - Product, volume & price, plus terms (specifications)
- Trading technicalities & strategies
- Basic questions
 - Who? → Market participants & types of traders
 - What? → Products & trading activities
 - o Why? → Reasons to enter into a contract; trading strategies
 o Where? → On-venue vs. off-venue; exchange & OTC trading
 - When? → Timing (spot vs. forward)
 - o How? → On-site & online (live, platform, chat), plus tools (phone, squawk box)

Level: Basic No prerequisites
 Intensity: 25 minutes Excluding examination
 Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE 11: PRODUCTS

This training covers the fundamentals of 'products and pricing'. It touches on the types of products. Attention is given to contracts and their features plus their specifications.

This training covers the following topics:

- Contracts
 - Commercial terms
 - Buyer vs. Seller
 - Underlying value
 - Volume
 - Price
 - o Non-commercial terms
- Settlement
 - o Physical delivery vs. Cash settlement
 - Physical delivery
 - o Immediate delivery vs. Delivery in time
 - o Delivery period vs. Delivery moment
- Contracts
 - o Spot products vs. Derivatives
 - Examples of derivatives
 - o Term contracts: Forwards & Futures
 - Swaps
 - o Options
 - o CFDs
 - Contract specifications
 - o Terms & conditions
 - o What? where, when, who & how?

Level: Basic No prerequisites
 Intensity: 25 minutes Excluding examination
 Language: Voice & text English
 Including: Examination Certification upon passing

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TRAINING COURSE 12: PRICING

This training covers the fundamentals of 'pricing'. It touches on the basics of the price formation process. Attention is given to the order book, order submission and deal making. Furthermore, attention is given to indices and settlement prices.

This training covers the following topics:

- Price formation
 - o Price level vs. price volatility
 - o Price drivers (fundamental & non-fundamental)
 - Orders book
 - Order submission, prioritization & execution
 - Orders types
- Concepts & Terminology
 - o Price correlation
 - Merit order
 - o Mean-reversion
 - Seasonality
 - Negative prices
 - o Spread
- Price-indexation
 - o Fixed price vs. Floating price
 - o Reference, or benchmark
 - o Settlement prices & their application
 - Indices
 - Calculation procedures

❖ Level: Basic No prerequisites❖ Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing



INSIDE INFORMATION – Online training courses

In the field of "Inside information" we have developed and maintain a variety of training courses; see hereafter.

Exams: Multiple choice (structure: A-B, reflecting "True" or "False").

Structure: Random selection of questions from database.

Passing rate: Minimum required score: 75%.

Maximum attempts: Four (4) attempts, being the initial exam plus three (3) re-takes.

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INSIDE INFORMATION – CAPITAL MARKETS

MARKET ABUSE

In the world of securities information may become available which can be qualified as inside information. What this concerns is relevant to know for professionals in the capital markets, as inside information has to be published. After all, on the basis of such information, the price of equity securities (like corporate shares) and debt securities (such as corporate bonds) can (and may be likely to) change. Corporate actions are a large portion of the pie; hence, these need to be mastered.

This course includes the following video lessons:

- 1. Securities & security prices
- 2. Management
- 3. Business dynamics
- 4. Financial performance
- 5. Corporate actions Introduction
- 6. Corporate actions Mergers & acquisitions
- 7. Corporate actions Coupon & dividend payments
- 8. Corporate actions Specific forms of dividend
- 9. Corporate actions Dividend date
- 10. Corporate actions Early redemption
- 11. Corporate actions Stock split
- 12. Corporate actions Cross-market impact
 - A. Examination
 - B. Certification

❖ Level: Basic No prerequisites

Intensity: 15 minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing

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INSIDE INFORMATION – ELECTRICITY PRODUCTION CAPACITY MARKET ABUSE

In the world of electricity, physical capacity may be unavailable. It could be the result of scheduled maintenance or it may concern unplanned unavailability; the latter, typically, being an ad hoc event. Irrespective of the type of maintenance, it may concern information which impacts the market. In order to create a level playing field for market participants, under certain regulations, an obligation applies to make the information publically available. Publication is mandatory when regulation classifies the information as inside information.

This course includes the following video lessons:

- 1. Introduction
- 2. Sudden outage
- 3. Timely publication
- 4. Local magazine
- 5. Threshold
- 6. Analysis & opinion
- 7. Rumour
- 8. Rumours & gossip
- 9. News broadcast
- 10. Insiders
- 11. Disclosing inside information
- 12. Contacting the service provider
- 13. Non-effective publication

- 14. Dissemination of information
- 15. Expecting maintenance any time shortly
- 16. Delay publication
- 17. Exceptions to insider trading
- 18. Trading plans
- 19. Joint venture
- 20. PPAs
- 21. Scheduling maintenance
- 22. Rescheduling maintenance
- 23. Post-maintenance test
- 24. Strike
- 25. Delayed return
- 26. Early return
- 27. Case: SSE

- A. Examination
- B. Certification

Level: Basic No prerequisites

Intensity: 40 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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INSIDE INFORMATION – *ELECTRICITY TRANSPORT CAPACITY*

MARKET ABUSE

In the world of electricity, physical capacity may be unavailable. It could be the result of scheduled maintenance or it may concern unplanned unavailability; the latter, typically, being an ad hoc event. Irrespective of the type of maintenance, it may concern information which impacts the market. In order to create a level playing field for market participants, under certain regulations, an obligation applies to make the information publically available. Publication is mandatory when regulation classifies the information as inside information.

This course includes the following video lessons:

- 1. Introduction
- 2. Wholesale energy markets
- 3. Market participants
- 4. Criteria
- 5. Transparency information versus inside information
- 6. Threshold
- 7. Sudden unavailability
- 8. Cross-border transmission capacity
- 9. Planning of maintenance
- 10. Timely publication
- 11. Effective publication
- 12. Delay of the publication
- 13. Exception to the prohibition of insider trading
- 14. System security Publication content
- 15. System security Publication responsible
- 16. System security Publication operations
- 17. Balancing plant dispatch
- 18. Network restrictions
- 19. Surveillance
 - A. Examination
 - B. Certification

Level: Basic No prerequisites
 Intensity: 35 minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing



MARKET MANIPULATION – Online training courses

In the field of "Market manipulation" we have developed and maintain a variety of training courses; see hereafter.

Exams: Multiple choice (structure: A-B, reflecting "True" or "False").

Structure: Random selection of questions from database.

Passing rate: Minimum required score: 75%.

Maximum attempts: Four (4) attempts, being the initial exam plus three (3) re-takes.

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MARKET MANIPULATION – ABUSIVE SCHEMES (REMIT) MARKET ABUSE

Under the Regulation on wholesale Energy Market Integrity and Transparency (REMIT), the Agency for the Cooperation of Energy Regulators (ACER) has developed a Guidance. The document, although it is legally non-binding, provides important insights in what is considered abusive, also in the sense of market manipulation. There are various types of market manipulation, being classified in categories of abuse. The abusive behaviours are quite diverse, including physical withholding, a typical activity not applicable to markets where equity or bonds are traded, but physical commodities.

This course includes the following video lessons:

- 1. Recital 13
- 2. Recital 14
- 3. Guidance Introduction
- 4. Guidance Wash trade
- 5. Guidance Improper matched order
- 6. Guidance Placing orders with no intention executing them
- 7. Guidance Marking the close
- 8. Guidance Abusive squeeze
- 9. Guidance Cross-market manipulation
- 10. Guidance Physical withholding
- 11. Guidance Scalping
- 12. Guidance Pump & dump
- 13. Guidance Circular trading
- 14. Guidance Pre-arranged trading
- 15. Guidance Spreading false or misleading information
- 16. Guidance Other behaviour to spread false or misleading information
- A. Examination
- B. Certification

Level: Basic No prerequisites

Intensity: 10 minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing

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MARKET MANIPULATION – WASH TRADES

MARKET ABUSE

Under various regulatory packages in the field of market abuse wash trades can be considered manipulative. Professionals with market access need to know about the ins and outs so that one can prevent abusive behaviour. Professionals with a market monitoring or surveillance function have to be able to detect abuse.

This course includes the following video lessons:

- 1. Introduction
- 2. Beneficial interest
- 3. Objectives
- 4. The UBS case
- 5. Hypothetical case
- 6. Wash trades to mark the close
- 7. Different structures for wash trades
- 8. Category of manipulation
- 9. Indicators of suspicious wash trades
- 10. Measures
- A. Examination
- B. Certification

Level: Basic No prerequisites

Intensity: 15 minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing

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MARKET MANIPULATION – SPOOFING & LAYERING

MARKET ABUSE

Under various regulatory packages in the field of market abuse, the techniques 'spoofing' and 'layering' are considered forms of market manipulation. Moreover, regulators have these schemes on top of their agenda. Professionals with market access must know what the strategies concern so that they know exactly what is prohibited and being able to prevent it. Next, experts in the field of market monitoring and surveillance should pay attention to the strategies' features in order to detect it.

This course includes the following video lessons:

- 1. Introduction
- 2. The objectives
- 3. Impact on the order book
- 4. Example Spoofing
- 5. Example Layering
- 6. In more detail
- 7. Price securing or sending false or misleading signals
- 8. Non-genuine orders
- 9. Indicators of spoofing & layering
- A. Examination
- B. Certification

Level: Basic No prerequisites
 Intensity: 15 minutes Excluding examination
 Language: Voice & text English

Including: Examination Certification upon passing

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MARKET MANIPULATION – PHYSICAL WITHHOLDING

MARKET ABUSE

Physical withholding concerns a manipulative scheme, which is not so much applied in equity or bond markets, but, instead, in the commodity commodities. Professionals with market access need to know about the ins and out so that one can prevent this kind of abusive behaviour. Professionals with a market monitoring or surveillance function have to be able to detect abusive behaviours.

This course includes the following video lessons:

- 1. Introduction
- 2. What can be withheld?
- 3. Emerging science
- 4. The California electricity crisis
- 5. The Iberdrola case
- 6. Intentionally booking sufficient capacity
- 7. Unintentionally withholding demand
- 8. Cross-zonal electricity transmission capacity hoarding Introduction
- 9. Cross-zonal electricity transmission capacity hoarding Implicit & explicit capacity allocation
- 10. Cross-zonal electricity transmission capacity hoarding Two aspects
- 11. Cross-zonal electricity transmission capacity hoarding Example with implicit allocation
- 12. Cross-zonal electricity transmission capacity hoarding Example with explicit allocation
- A. Examination
- B. Certification

❖ Level: Basic No prerequisites

Intensity: 20 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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MARKET MANIPULATION - CROSS-MARKET MANIPULATION MARKET ABUSE

Cross-market manipulation involves undertaking trading in one market with a view to improperly influencing the price of the same or a related product in another market. A manipulator could transact (or place an order to transact) in one market to influence the behaviour of market participants in another market, so that the manipulator can profit from the impact in the other markets. How this takes place appears in many forms, including cross-border, cross-time, cross-commodity, cross-jurisdiction, and so forth. Hence, various techniques have to be mastered in order to prevent or detect this form of market abuse.

This course includes the following video lessons:

- 1. Introduction to cross-market manipulation
- 2. Classifying cross-market manipulation
- 3. Types of cross-market manipulation
- 4. Cross-border manipulation
- 5. Cross-commodity manipulation
- 6. Cross-regulation & cross-jurisdiction manipulation
- 7. Cross-period manipulation
- 8. Combinations
- 9. Price positioning & market liquidity
- 10. Options versus the underlying value
- 11. Arbitrage is a legitimate strategy
 - A. Examination
 - B. Certification

Level: Basic No prerequisites
 Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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MARKET MANIPULATION – PUMP & DUMP

MARKET ABUSE

Market manipulation is prohibited. Transactions which involve a fictitious device or deception are considered a specific category of market manipulation. A subset thereof concerns 'pump & dump', as well as trash & cash. In this course it is set out what these abusive schemes concern.

This course includes the following video lessons:

- 1. Transactions involving fictitious devices / deception
- 2. Pump & dump
- 3. Abusing media
- 4. Voicing an opinion
- 5. Trash & cash
- 6. Combined schemes
- 7. Susceptible markets
 - A. Examination
 - B. Certification

❖ Level: Basic No prerequisites

Intensity: 15 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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MARKET MANIPULATION – *MARKING THE CLOSE*

MARKET ABUSE

Marking the close concerns a form of market manipulation. It concerns the manipulation of reference prices, such as settlement prices, indices or markers, which are used as reference to settle contracts, like commodity supply agreements of financial instruments, such as cash settled derivatives. Manipulation of a reference price would imply that invoicing takes place on an incorrect price reference. Analogously, positions are valuated in an incorrect way. However, regulations which prohibit market abuse in financial markets aim to protect investors, while regulations which prohibit market abuse in commodity and energy markets aim to protect consumers.

This course includes the following video lessons:

- 1. Price positioning Introduction
- 2. Price positioning When and where?
- 3. Marking the close Introduction
- 4. Settlement of commodity supply contacts
- 5. Settlement of derivatives contracts
- 6. Valuation of contracts
- 7. Markers
- 8. Calculation procedures
- 9. Conflict of interests
- 10. Mistakes
- 11. Benchmarks
- 12. Corporate policy
- 13. Triggering stop-loss orders
- 14. Choice market
- 15. Suspicious timing
 - A. Examination
 - B. Certification

Level: Basic No prerequisites

Intensity: 25 minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing

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MARKET ABUSE

MARKET MANIPULATION - DISSEMINATION OF FALSE OR MISLEADING INFORMATION

This course is about the dissemination of information that is considered false or misleading. In those cases the market could be impacted and that must be prevented. A party can commit this form of market abuse intentionally or unintended. Both concern market abuse. Hence, professionals have to master related knowledge to raise awareness in this field.

This course includes the following video lessons:

- 1. Introduction
- 2. Not order- or deal-related
- 3. Via the media
- 4. Non-media
- 5. Immature markets
- 6. Gossip & rumours
- 7. Misinformation
- 8. Disinformation
- 9. Fake news
- 10. Malinformation
- 11. Information pollution & disorder
- 12. Incorrect data
- 13. Bull & bear raids
- 14. Case Oil price up
- 15. Case DJI down
- 16. Case SEC James Craig
- 17. Case Intergen
- 18. Case EDF
 - A. Examination
 - B. Certification

Level: Basic No prerequisites
 Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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MARKET ABUSE

MARKET MANIPULATION - PRE-ARRANGED TRADING & CROSS-TRADES

This course examines the manipulative scheme 'pre-arranged trading'. It is also set out what crossing concerns. The course covers various practical cases and some jurisprudence.

This course includes the following video lessons:

- 1. Introduction
- 2. Crossing
- 3. Accepted market practice
- 4. Pre-execution communications
- Crossing procedures & methods
- 6. Case Unauthorised cross-trades
- 7. Case Artificially raising the price
- 8. Case Excluding competition
- 9. Case ICE (2005)
- 10. Case Block-trades
 - A. Examination
 - B. Certification

Level: Basic No prerequisites

Intensity: 20 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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MARKET MANIPULATION – CIRCULAR TRADING

MARKET ABUSE

This course examines the manipulative scheme 'circular trading'. It is set out what this behaviour concerns. The course covers various practical cases and some jurisprudence.

This course includes the following video lessons:

- 1. Introduction
- 2. How it works
- 3. Example
- 4. Conspiracy
- 5. Case Yen option
- 6. Case Matched trades
- 7. Cluster
 - A. Examination
 - B. Certification

Level: Basic No prerequisites

Intensity: 10 minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing

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MARKET MANIPULATION - PARKING

MARKET ABUSE

This course examines the manipulative scheme 'parking'. It is set out what this behaviour concerns. The course covers various practical cases.

This course includes the following video lessons:

- 1. Borrowing & lending
- 2. Repos
- 3. The concept of parking
- 4. Varieties
- 5. Avoiding inventory charges
- 6. External & internal parking
- 7. External parking Avoiding aging inventory limits
- 8. External parking Avoiding capital requirements
- 9. Internal parking Cases
 - A. Examination
 - B. Certification

❖ Level: Basic No prerequisites

Intensity: 10 minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing

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MARKET ABUSE

MARKET MANIPULATION - COMPENSATION TRADES & MONEY PASSES

This course examines the abusive practices 'compensation trades' and 'money passes'. It is set out what this kind of activity concerns. The course covers various practical cases.

This course includes the following video lessons:

- 1. Reciprocity & rewarding
- 2. Case LIBOR
- 3. Money transfer
- 4. Money transfer Case Two accounts
- 5. Fraudulent money passes Introduction
- 6. Fraudulent money passes Firm accounts
- 7. Fraudulent money passes Client accounts
- 8. Lacking similarity
- 9. Lacking similarity Timing differential
- 10. Lacking similarity Price differential
- 11. Lacking similarity Volume differential
 - A. Examination
 - B. Certification

❖ Level: Basic No prerequisites

Intensity: 15 minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing

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MARKET ABUSE

MARKET MANIPULATION - MARKET CORNERING & ABUSIVE SQUEEZES

This course examines the manipulative scheme 'market cornering'. It is set out what squeezes concern and when these are abusive. The course covers various practical cases.

This course includes the following video lessons:

- 1. Cornering
- 2. Squeezing
- 3. Onions
- 4. Soybeans & cotton
- 5. Crude oil
- 6. Sumitomo copper affair
- 7. Silver Thursday
- 8. Cacao
 - A. Examination
 - B. Certification

Level: Basic No prerequisitesIntensity: 20 minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing

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MARKET MANIPULATION – BROKERAGE SERVICES

MARKET ABUSE

This course is dedicated to the involvement of brokers in manipulative schemes, either with or without the brokers' intention. Practical examples in this course create awareness about possible activities or structures.

This course includes the following video lessons:

- 1. Interdealer brokers versus broker-dealers
- 2. Transparency
- 3. Collusion
- 4. Commission
- 5. Churning
- 6. Intent
- 7. Awareness & responsibility
- 8. Wash trades
- 9. Cross-trade
- 10. Crossing Case
- 11. Complexisation
- 12. Charades
- 13. Fine for poor monitoring controls
 - A. Examination
 - B. Certification

Level: Basic No prerequisites

Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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MARKET MANIPULATION - FAIR & ORDERLY TRADING MARKET ABUSE

In the rulebook of trading venues it is usually stated that trading on the venue's platform has to be fair and orderly. This course talks about fair and orderly trading. It sets out what this implies and gives insight in practical examples, including how it can be prevented or detected.

This course includes the following video lessons:

- 1. Introduction
- 2. Unfair & disorderly trading
- 3. Reckless acting
- 4. Disruptive practices
- 5. Trade surveillance criteria
- 6. Fair & orderly defined
- 7. Economic justification
- 8. Flipping
- 9. Examples
- 10. Case
 - A. Examination
 - B. Certification

Level: Basic No prerequisites

Intensity: 20 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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MARKET MANIPULATION - OIL MARKETS

MARKET ABUSE

This course examines the manipulation of the oil markets. Various practical cases are covered and insight is given in jurisprudence or enforcement actions.

This course includes the following video lessons:

- 1. Introduction
- 2. Panther energy trading
- 3. Arcadia Petroleum & Parnon Energy
- 4. The hammer
- 5. The intent of orders
- 6. Reference price manipulation Platts
- 7. Reference price manipulation Argus
- 8. Crossing BNP Paribas
- 9. Disorderly trading BNP Paribas
 - A. Examination
 - B. Certification

Level: Basic No prerequisitesIntensity: 10 minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing

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MARKET MANIPULATION - METAL MARKETS

MARKET ABUSE

This course deals with manipulation of the markets for metals. Various practical cases are covered and insight is given in jurisprudence or enforcement actions.

This course includes the following video lessons:

- 1. Introduction
- 2. Moore Capital Marking the close Platinum & Palladium
- 3. JP Morgan
- 4. Bank of Nova Scotia Spoofing
- 5. Igor Oystacher
- 6. Sumitomo copper affair Hamanaka
 - A. Examination
 - B. Certification

❖ Level: Basic No prerequisites

Intensity: 10 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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MARKET ABUSE

MARKET MANIPULATION - AGRICULTURAL COMMODITY MARKETS

This course deals with manipulation of the markets for agricultural commodities. Various practical cases are covered and insight is given in jurisprudence or enforcement actions.

This course includes the following video lessons:

- 1. Introduction
- 2. Food price manipulation
- 3. Value chain
- 4. Wheat futures & options Cash corn
- 5. Position limit breach Cash wheat & wheat futures
- 6. Soybeans (1989)
- 7. Coffee Warehouses
- 8. Coffee Options
- 9. Ecoval Dairy
- 10. Moncada Wheat
 - A. Examination
 - B. Certification

Level: Basic No prerequisites

Intensity: 15 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing



REGULATION - Online training courses

In the field of "Regulation" we have developed and maintain numerous training courses; see hereafter.

Exams: Multiple choice (structure: A-B, reflecting "True" or "False").

Structure: Random selection of questions from database.

Passing rate: Minimum required score: 75%.

Maximum attempts: Four (4) attempts, being the initial exam plus three (3) re-takes.

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TRAINING COURSE: MAR - DEFINITIONS

REGULATION

The Market Abuse Regulation (MAR) sets out a large range of definitions, which are used in its provisions. In order to understand and comply with the regulation, one has to familiarise with the definitions. This is why these definitions have been provided in the form of easy accessible movies. Professionals can master the content and/or consult the videos instantly in case of an ad hoc need. This way, a database is created meeting the desire to go over it once more and allowing for continuous professional development guaranteed.

This course includes the following video lessons:

- 1. Inside information
- 2. Issuer
- 3. Emission Allowances Market Participant (EAMP)
- 4. Person professionally arranging or executing transactions (PPAET)
- 5. Spot commodity contract
- 6. Spot market
- 7. Benchmark
- A. Examination
- B. Certification

Level: Basic No prerequisites
 Intensity: 15 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE: MIFID II - DEFINITIONS

REGULATION

The second version of the Markets in Financial Instruments Directive (MiFID II) sets out a large range of definitions, which are used in its provisions. In order to understand and comply with this piece of legislation, one has to familiarise with the definitions. This is why these definitions have been provided in the form of easy accessible movies. Professionals can master the content and/or consult the videos instantly in case of an ad hoc need. This way, a database is created meeting the desire to go over it once more and allowing for continuous professional development guaranteed.

This course includes the following video lessons:

- 1. Investment services & activities
- 2. Ancillary services
- 3. Financial instruments
- 4. C6 derivatives
- 5. Exchange-traded fund
- 6. Dealing on own account
- 7. Direct electronic access
- 8. Execution of orders on behalf of others
- 9. Investment advice
- 10. Client
- 11. Trading venue
- 12. Regulated market (RM)
- 13. Multilateral trading facility (MTF)
- 14. Organised trading facility (OTF)
- 15. Market operator

- 16. Multilateral system
- 17. Systemic Internaliser (SI)
- 18. Market maker
- 19. Algorithmic trading
- 20. High frequency trading (HFT)
- 21. Liquid market
- 22. Portfolio management
- 23. Portfolio compression
- 24. Approved reporting mechanism (ARM)
- 25. Limit order
- 26. Senior management
- A. Examination
- B. Certification

Level: Basic No prerequisites
 Intensity: 55 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE: REMIT - DEFINITIONS

REGULATION

The Regulation on wholesale Energy Market Integrity and Transparency (REMIT) sets out a large range of definitions, which are used in its provisions. In order to understand and comply with the regulation, one has to familiarise with the definitions. This is why these definitions have been provided in the form of easy accessible movies. Professionals can master the content and/or consult the videos instantly in case of an ad hoc need. This way, a database is created meeting the desire to go over it once more and allowing for continuous professional development guaranteed.

This course includes the following video lessons:

- 1. Inside information
- 2. Wholesale energy product
- 3. Wholesale energy market
- 4. Market participant
- 5. Consumption capacity
- A. Examination
- B. Certification

Level: Basic No prerequisites
 Intensity: 10 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing



COMPLIANCE – Online training courses

In the field of "Compliance" we have developed and maintain numerous training courses; see hereafter.

Exams: Multiple choice (structure: A-B, reflecting "True" or "False").

Structure: Random selection of questions from database.

Passing rate: Minimum required score: 75%.

Maximum attempts: Four (4) attempts, being the initial exam plus three (3) re-takes.

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TRADE COMPLIANCE – THE BASICS

COMPLIANCE

This course deals with the role of the compliance function. It is set out what one can expect of the compliance officer. Attention is given to how the firm and its employees are shielded by the compliance function.

This course includes the following video lessons:

- 1. A control function
- 2. Tasks
- 3. Primary point of contact
- 4. Compliance framework
- 5. Compliance regime
- 6. Incident logging
- 7. Code or conduct
- 8. Rules of engagement
- 9. Obligations & prohibitions
- 10. Culture Trust & confidence
- 11. Culture Misunderstood
 - A. Examination
 - B. Certification

Level: Basic No prerequisites
 Intensity: 30 minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing

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MARKET ABUSE

MARKET MANIPULATION - ALGORITHMIC TRADING COMPLIANCE

This course is about the rules and regulations that have to be complied with when performing algorithmic trading. It also sets out what abusive practices could take place but must be prevented and detected.

This course includes the following video lessons:

- 1. Main concerns
- 2. Formal accusation
- 3. Execution & responsibility
- 4. Quote stuffing
- 5. Momentum ignition
- 6. Ticker tape trading
- 7. Flash crash
- 8. The Sarao case
- 9. Compliancy regime
- 10. Systems & control
- 11. Pre-trade controls
- 12. Testing
- 13. Direct electronic access
- 14. Market making
- 15. Systemic risk management By trading venue
- 16. Systemic risk management By algo trader
- 17. Automated surveillance system
- 18. Contact with regulator
- 19. Governance The governance framework
- 20. Governance The management body
- 21. Governance Algo trading policy
 - A. Examination
 - B. Certification

Level: Basic No prerequisites
 Intensity: 40 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing



SURVEILLANCE - Online training courses

In the field of "Surveillance" we have developed and maintain numerous training courses; see hereafter.

Exams: Multiple choice (structure: A-B, reflecting "True" or "False").

Structure: Random selection of questions from database.

Passing rate: Minimum required score: 75%.

Maximum attempts: Four (4) attempts, being the initial exam plus three (3) re-takes.

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SURVEILLANCE

SURVEILLANCE - FINANCIAL CRIME - A HOLISTIC APPROACH

This course is dedicated to surveillance in the field of financial crime. It coves how surveillance can be organised and what is relevant when trying to prevent and detect money laundering, terrorist financing, bribery, tax fraud, scams and market abuse. Main focus is on systems.

This course includes the following video lessons:

- 1. Complete risk overview
- 2. Integrated solution
- 3. Architecture
- 4. Functional components
- 5. Context
- 6. Detection techniques
- 7. Investigation tools
- 8. Reporting Information & records
 - A. Examination
 - B. Certification

❖ Level: Basic No prerequisites

Intensity: XX minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing

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TRADE SURVEILLANCE - THE BASICS

SURVEILLANCE

This course concerns the fundamentals of trade surveillance. It is explained how markets can be monitored and what aspects are of relevance. This course shows how to assure effectiveness.

This course includes the following video lessons:

- 1. Introduction
- 2. Avoid violations
- 3. Risk identification Assessment & control
- 4. Criterion Effective
- 5. Criterion Appropriate
- 6. Criterion Proportionate
- 7. Scope
- 8. Case handling Incident management & Repoting
- 9. Investigation & reporting
- 10. Case building
- 11. Discretion
- 12. Effective market monitoring Procedures
- 13. Effective market monitoring People
- 14. Effective market monitoring Systems
- 15. Effective market monitoring Methods Introduction
- 16. Effective market monitoring Methods Statistical reviews
- 17. Effective market monitoring Methods Combining types of trading
- 18. Effective market monitoring Methods Monitoring financial performance
- 19. Effective market monitoring Methods Periodic reviews
- 20. Effective market monitoring Methods Ad hoc analysis
- 21. Effective market monitoring Methods Storage of communication data
- 22. Effective market monitoring Methods Optimise culture
- 23. Effective market monitoring Methods Whistleblowing
 - A. Examination
 - B. Certification

| * | Level: | Basic | No prerequisites |
|---|------------|--------------|----------------------------|
| * | Intensity: | XX minutes | Excluding examination |
| * | Language: | Voice & text | English |
| * | Including: | Examination | Certification upon passing |
| | | | |

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TRADE SURVEILLANCE - SYSTEMS

SURVEILLANCE

This course covers surveillance systems, as supportive tool to perform market monitoring. Various aspects are of relevance are set out, including .

This course includes the following video lessons:

- 1. Introduction
- 2. Software solution
- 3. Approaches to surveillance
- 4. Data collection & entry
- 5. Indicators
- 6. Data analysis Processes
- 7. Data analysis Types of data
- 8. Data management
- 9. Selection
- 10. Insider trading & market manipulation
- 11. Taks
- 12. Selection criteria
- 13. Regulatory scope
- 14. Complexity
- 15. Calibration
- 16. Interpretation of alerts
- 17. Communication software
 - A. Examination
 - B. Certification

Level: Basic No prerequisitesIntensity: XX minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRADE SURVEILLANCE - OPTION MARKETS

SURVEILLANCE

This course covers points of attention to the prevention and detection of market manipulation in option markets. It is explained how abuse could take place and what measures could be taken to avoid such from happening.

This course includes the following video lessons:

- 1. Introduction
- 2. Option pricing Introduction
- 3. Option pricing Moneyness
- 4. Option pricing Exercise style
- 5. Orders or transaction-related schemes
- 6. Derivative of derivative
- 7. Cross-market manipulation
- 8. Squeezing & cornering
- 9. Blowing up open interest
- 10. Freezing & ramping
- 11. Marking
- 12. Hidden orders & Triggers
- 13. Path-dependency
- 14. Path-dependency Protection
- 15. Path-dependency Avoidance
- 16. Indicators of market manipulation
 - A. Examination
 - B. Certification

Level: Basic No prerequisites

Intensity: 40 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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SURVEILLANCE

TRADE SURVEILLANCE - INDICATORS OF MANIPULATIVE BEHAVIOUR

This course talks about indicators to detect market manipulation. It is set out what aspects should be given attention to tackle abuse. In addition, specific abusive practices are related to those indicators.

This course includes the following video lessons:

- 1. Introduction
- 2. Proportion of daily volume
- 3. Significant price change
- 4. No change in beneficial ownership
- 5. Position reversals in a short period
- 6. Concentration of activity & reverting price
- 7. Tightening bid-ask spread
- 8. Reference prices & pricing windows
- 9. Orders Submission, amendment & cancellation
- 10. False or misleading information
- 11. Investment recommendations
- 12. More indicators
- 13. Models to analyse data
- 14. Ping orders
- 15. Pishing
- 16. Creating a floor or ceiling
- 17. Buying in the secondary market
- 18. Concealing ownership
- 19. Excessive bid-ask spread
- 20. Advancing the bid
- 21. Smoking
 - A. Examination
 - B. Certification

| ** | Level: | Basic | No prerequisites |
|----|------------|--------------|-----------------------|
| * | Intensity: | 30 minutes | Excluding examination |
| * | Language: | Voice & text | English |

Including: Examination Certification upon passing



CONDUCT – Online training courses

In the field of "Conduct" we have developed and maintain numerous training courses; see hereafter.

Exams: Multiple choice (structure: A-B, reflecting "True" or "False").

Structure: Random selection of questions from database.

Passing rate: Minimum required score: 75%.

Maximum attempts: Four (4) attempts, being the initial exam plus three (3) re-takes.

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TRAINING COURSE: MORALITY

CONDUCT

Morality relates to ethics,, whereas ethics is related to commandments and prohibitions. It concerns activities which are allowed or not allowed. Analogously, integrity involves conduct and misconduct. It concerns behaviour and misbehaviour. Ethical or unethical decisions relate to the debate about desirable and undesirable behaviour. It involves the discussion about right or wrong. Ethics deals with moral dilemmas.

This course includes the following video lessons:

- 1. Evil
- 2. Moral development
- 3. Moral disengagement
- 4. Optimising morality
- 5. Moral stretching
- A. Examination
- B. Certification

Level: Basic No prerequisites

Intensity: 15 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE: DECISION-MAKING & BEHAVIOUR

CONDUCT

Emotions often play a crucial role in the decision-making process. The fear factor can be one of the drivers impacting choices. Typically, this leads to underperformance. Eventually, it may even lead to unethical or non-integer behaviour.

Stress is another relevant aspect that sets context. For some professionals this element is an important part of their profession. However, one could doubt whether enough attention is given to this factor. Is the individual conscious of this matter?

This course includes the following video lessons:

- 1. Rationality versus irrationality
- 2. Performance
- 3. Multi-disciplinary approach
- 4. The human brain
- 5. Hormones
- 6. Pressure & stress
- 7. Market analysis
- 8. Behaviour & conduct
- 9. Deviation from rationality
- 10. Cognitive errors
- A. Examination
- B. Certification

❖ Level: Basic No prerequisites

Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE: ETHICAL BLINDNESS

CONDUCT

People often have an inappropriate view on reality. In addition, they could have difficulty interpreting reality, which leads to misconceptions or misperceptions, and, eventually, even to ethical blindness. After all, when making decisions, people are embedded in context. This context may be so strong that one feels forced to take certain decisions. Some of these feelings may be experienced only unconsciously, leading to a certain automatic acting, as if someone is on autopilot. This way, one can become ethically blind, meaning that one is unaware of making wrong decisions.

This course includes the following video lessons:

- 1. Environmental influences
- 2. Subjectivity of ethicalness
- 3. Ethical versus unethical cultures
- 4. Complexity of today's world
- 5. Complexity brings dilemmas
- 6. Culture sets context
- 7. Rationality versus mental traps
- 8. A strong context
- 9. Pressure
- 10. Fear
- 11. Drivers of ethical blindness
- A. Examination
- B. Certification

Level: Basic No prerequisites

Intensity: 25 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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TRAINING COURSE: CONDUCT MANAGEMENT

CONDUCT

Conduct management refers to the set of procedural skills that organisations and professionals employ in their attempt to address and resolve discipline problems at work. It includes acknowledgment of responsible behaviours, correction of irresponsible and inappropriate behaviour, gentle verbal reprimands, time-out for employees, notification of colleagues, reinforcement systems and a corporate code of conduct.

This course includes the following video lessons:

- 1. Emotional decisions & behaviour
- 2. Free will
- 3. Situationalism
- 4. Dominating themes
- 5. Mental framework
- 6. The mental environment
- 7. Abandon fear
- 8. Darwinism
- 9. Stress blocks information
- 10. Mental spiral
- A. Examination
- B. Certification

Level: Basic No prerequisites

Intensity: 25 minutes **Excluding examination**

Language: Voice & text **English**

Including: Certification upon passing Examination

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TRAINING COURSE: PSYCHOLOGY

CONDUCT

Both rationale and emotions relate to the decision-making process of human beings. This automatically implies that both ratio and feelings impact our actions or behaviour. Psychological aspects, including mental traps, can impact a professional's performance, as well as one's attitude.

The decision-making process of human beings is optimised by various natural strategies. Heuristics are examples of these; they are cognitive strategies. Framing concerns another mental strategy to optimise the decision-making process. Other anomalies lead to the same. All these cognitive biases impact our behaviours.

This course includes the following video lessons:

- 1. Cognitive anomalies
- 2. Heuristics
- 3. A list of heuristics
- 4. An example of heuristics: Gambler's fallacy
- 5. An example of heuristics: Loss aversion
- 6. An example of heuristics: Self-serving bias
- 7. Framing
- 8. Language & culture create frames
- 9. The thinking-speaking-acting connection
- 10. An example of framing:
- 11. Tversky & Kahneman's research experiment
- 12. Anomalies
- 13. An example of an anomaly: Greed & fear
- 14. An example of an anomaly: Herd behaviour
- 15. An example of an anomaly: Sunk cost fallacy
- 16. Coping with mental traps & biases
- A. Examination
- B. Certification

❖ Level: Basic No prerequisites
 ❖ Intensity: 40 minutes Excluding examination

❖ Language: Voice & text English

Including: Examination Certification upon passing

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LEADERSHIP FEATURES & PERFORMANCE RULES

CONDUCT

Leaders help themselves and others to do the right things. They set direction, build an inspiring vision, and create something new. The qualification 'leadership' involves the mapping of where an organisation or team needs to go in order to perform optimally. Leaders bring dynamics and excitement and they are inspiring.

Although leaders set the direction, they must also use management skills to guide members of staff to the right destination, in a smooth and efficient way. Above all, leaders need to manage themselves, before managing others.

This course includes the following video lessons:

- 1. Leadership requires mental management
- 2. Leadership requires continuous learning
- 3. Leadership requires pro-activity
- 4. Leadership requires operational excellence
- 5. Leaders could face patterns of irrationality
- 6. Leadership requires throrough preparation
- 7. Operational excellence requires a professional environment
- 8. Leadership requires discipline
- 9. Leadership requires control & avoidance of recklessness
- 10. Leadership requires interpretation & anticipation
- 11. Leadership requires a working plan
- 12. Leadership features & performance rules
- A. Examination
- B. Certification

Level: Basic No prerequisites

Intensity: 25 minutes Excluding examination

Language: Voice & text English

Including: Examination Certification upon passing



STAND-ALONE EXAMS – CONTINUOUS PROFESSIONAL DEVELOPMENT

Some regulations oblige employers to provide their employees training, and to do so periodically, as well as to raise awareness. For this matter we develop annual exams. Candidates who pass the exam are certified accordingly.

1. Market Abuse - 2023

Exams: Multiple choice (structure: A-B, reflecting "True" or "False").

Structure: Random selection of questions from database.

Passing rate: Minimum required score: 75%.

Maximum attempts: Four (4) attempts, being the initial exam plus three (3) re-takes.

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ANNUAL TEST: MARKET ABUSE - 2023

In the field of market abuse we have developed an extensive database with questions and answers. This database is maintained and updated on an annual basis. Candidates can take the exam to meet the regulatory requirement of employees to be trained, raising their awareness and be updated periodically.

For each exam a candidate takes a random selection is made from the pool of questions. This year's exam covers the following topics:

- Market abuse
 - Insider trading
 - > Order management
 - Placing, cancelling and amending orders
 - Other
 - Inducing & inciting other people
 - o Market manipulation
 - Transacting/order management which is misleading
 - Dissemination of false/misleading information
- Inside information
 - o Criteria to qualify information as inside information
 - Obligation to publish inside information
- Compliance
 - o Risk of non-compliance
 - Reputational risk
- Monitoring & surveillance
 - o Parties with an obligation to perform monitoring or surveillance
 - o Reporting suspicious behaviour
- Sanctioning
 - o Administrative sanctions
 - Criminal sanctions

Level: BasicIntensity: 10 minutes

Language: Voice & text English

Including: Certification Upon passing the exam

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THE ONLINE LEARNING ENVIRONMENT

CASE-STUDIES & OTHER MATERIALS

AWARENESS & PRACTICALITIES

COVERAGE BY VIDEO LESSONS AND OTHER STUDY MATERIALS
- ALL INCLUDING EXAMINATION & CERTIFICATION

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PRACTICAL CASES – Practical applicability

In the field of "Market Abuse" we have developed and maintain cases, dilemma discussions considerations in the following categories:

- 1. Inside information
- Capital markets
- 2. Inside information
- Electricity markets
- 3. Inside information
- Gas markets
- 4. Insider trading
- 5. Behaviour Information-related activity
- 6. Behaviour Trading patterns
- 7. Behaviour Order- related activity Various
- 8. Behaviour Order- related activity Orders at extreme prices
- 9. Behaviour Deal- related activity Various
- 10. Behaviour Deal- related activity Off-market deals
- 11. Behaviour Technology-related activity
- 12. Behaviour Capacity-related activity
- 13. Behaviour Cross-trades General
- 14. Behaviour Cross-trades Cross-border *Electricity*
- 15. Behaviour Day-ahead auctions *Electricity*
- 16. Behaviour Intraday & balancing markets Electricity & Gas
- 17. Behaviour Broker involvement

> Structure:

With each case study the situation is set out.

Based thereon open questions are raised that a learner is supposed to answer.

This concerns whether the activity concerns abuse.

The learner is asked to explain his/her answer and provide reflections and/or relevant criteria.

Upon the input an immediate response is generated.

Thereupon the learner is invited to drop final comments or thoughts.

The system processes this and provides further tips and considerations.

> Observer role:

Meanwhile, Client and/or Entrima act in the capacity of Observer. Observers have access to answers allowing them to identify knowledge gaps. Based thereon suggested focus areas are identified.

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OVERVIEW

GENERAL INFORMATION – CONCERNING THE CASES

The practical cases at the learning platform contribute to market abuse prevention and detection, thereby improving market integrity. Simultaneously, going over the cases decreases the chance of professionals to become involved with disruptive behaviour or to commit abuse. This mitigates the reputational risk of market participants.

Objective:

The practical cases aim to increase the awareness of learners. This way, they will be better able to identify what aspects are of relevance, which considerations one can make and what kind of activities are legitimate.

In the form of cases, learners will encounter practical situations (actual or hypothetical). In reality, the situation may require an action, or some consideration. Anyhow, the learner is invited to interpret the situation or the circumstances, whereupon the learner is invited to share those views via the platform. On the back of any case, the learner is challenged to see what the situation implies, what should be done and/or to provoke a dilemma discussion.

Notes:

• The learning platform provides the learner with feedback right upon the learner's input. The system's immediate evaluation (output) is presented to the learner. This output is based on 'best practices' or 'shared views' of market participants, or it is based on guidance by the authorities.

Disclaimer:

Though the content is developed with utmost care, and tested by professionals in the markets, in no way the output of the learning platform provides for a legal status. Hence, no rights can be claimed from the content of Entrima's learning platform, nor does Entrima accept any liability for any views expressed as to the legal application of any law or its implementation.

• In case of a group registration, the learners' colleague(s) from the compliance function, surveillance function or management might be enabled to view the learners' input. This way, one can identify the loopholes in required expertise (of an individual and/or within the group as a whole). This allows for the provision of additional attention in the identified fields, to further optimise the required knowledge levels, skills and awareness.

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CASES

INSIDE INFORMATION – CAPITAL MARKETS

INFORMATION

At the learning platform there are various cases in the field of inside information relating to the capital markets. This includes the following:

- 1. Acquisition
- 2. Merger
- 3. Corporate bond issue & fund manager
- 4. Corporate bond issue & talks at home
- 5. Early redemption
- 6. Profit warning
- 7. Dividend payout
- 8. Dividend date adjustment
- 9. Stock buy-back programme
- 10. Stock split

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CASES

INSIDE INFORMATION – *ELECTRICITY MARKETS*

INFORMATION

At the learning platform there are various cases in the field of inside information relating to the capital markets. This includes the following:

- 1. Precise nature Strike
- 2. Precise nature A set of circumstances
- 3. Realistic prospect Information on strikes
- 4. Realistic prospect Security test request
- 5. Intermediate steps Re-commissioning capacity
- 6. Intermediate steps Expansion of transmission capacity
- 7. Likely to significantly affect price Extended unavailability
- 8. Likely to significantly affect price System operator
- 9. Inside information (or not) Order submission
- 10. Inside information (or not) Risk optimising strategy
- 11. Unlawful disclosure of inside information
- 12. Recommending or inducing trading

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INSIDE INFORMATION – GAS MARKETS

INFORMATION

At the learning platform there are various cases in the field of inside information relating to the capital markets. This includes the following:

- 1. Timely update of information?
- 2. Final-customer supply contracts

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INSIDER TRADING

BEHAVIOUR

At the learning platform there are various cases in the field of "Insider trading". This includes the following:

- 1. Front running Drinking coffee at the same machine
- 2. Listening to a conversation Electricity
- 3. Front running Electricity

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INFORMATION-RELATED ACTIVITY

BEHAVIOUR

At the learning platform there are various cases covering situations with behaviour relating to "Information-related activity". This includes the following:

- 1. Dissemination of false or misleading information Fake news
- 2. Dissemination of false or misleading information Inside information
- 3. False or misleading signals Industrial electricity consumer
- 4. False or misleading signals Transmission system operator
- 5. False information Price reporting agency Power

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TRADING PATTERNS

BEHAVIOUR

At the learning platform there are various cases in the field of abusive trading patterns. This includes the following:

- 1. Flashing
- 2. Pinging
- 3. Diming
- 4. Matching orders of competitor

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ORDER-RELATED ACTIVITY – VARIOUS

BEHAVIOUR

At the learning platform there are various cases covering situations with behaviour relating to "Order-related activity". This includes the following:

- 1. Layering Varying volumes Non-genuine orders
- 2. Spoofing Demand signals Non-genuine orders

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ORDER-RELATED ACTIVITY – ORDERS AT EXTREME PRICES

BEHAVIOUR

At the learning platform there are various cases covering situations with behaviour relating to "Orders at extreme prices". This includes the following:

- 1. Order close to trading system's price limit
- 2. Buy order with super low price
- 3. Erroneous orders
- 4. Erroneous orders The Eneco case

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DEAL-RELATED ACTIVITY - VARIOUS

BEHAVIOUR

At the learning platform there are various cases covering situations with behaviour relating to "Deal-related activity". This includes the following:

- 1. An A-to-A trade
- 2. An A-to-B-to-A trade
- 3. A-to-B + C-to-A trades
- 4. Buying and selling same volume at same price
- 5. Price positioning

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DEAL-RELATED ACTIVITY – OFF-MARKET DEALS

BEHAVIOUR

At the learning platform there are various cases covering situations with behaviour relating to "Offmarket deals". This includes the following:

1. Artificial gas price level – Marking

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TECHNOLOGY-RELATED ACTIVITY

BEHAVIOUR

At the learning platform there are various cases covering situations with behaviour relating to "Technology-related activity". This includes the following:

- 1. Price-setting algorithm
- 2. Purpose of design
- 3. Malfunctioning trading algo
- 4. Jumping by algorithm
- 5. Momentum ignition
- 6. False or misleading signals

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CAPACITY-RELATED ACTIVITY

BEHAVIOUR

At the learning platform there are various cases covering situations with behaviour relating to "Capacity-related activity". This includes the following:

- 1. Not offering potential flow from production capacity
- 2. Withholding capacity Economically
- 3. OFGEM Open Letter Scarcity pricing
- 4. Electricity transmission capacity Full reverse
- 5. Electricity transmission capacity Booking platform
- 6. Electricity transmission capacity Monopolisation
- 7. Electricity transmission capacity Successive events
- 8. Electricity transmission capacity Explicit allocation

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CROSS-TRADES

BEHAVIOUR

At the learning platform there are various cases covering situations with behaviour relating to "Crosstrades". This includes the following:

- 1. The concept
- 2. Preventing parties being misled
- 3. Reasons

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CROSS-BORDER CROSS-TRADES – POWER MARKET-SPECIFIC



At the learning platform there are various cases covering situations with behaviour relating to "Crossborder cross-trades". This includes the following:

1. T.b.d.

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DAY-AHEAD AUCTIONS – POWER MARKET-SPECIFIC



At the learning platform there are various cases covering situations with behaviour relating to "day-ahead auctions". This includes the following:

- 1. Physical withholding
- 2. Erroneous order
- 3. Handling a manifest order
- 4. Hydro facilities are no fossil fuelled power plants

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INTRADAY & BALANCING MARKETS - POWER MARKET-SPECIFIC BEHAVIOUR

At the learning platform there are various cases covering situations with behaviour relating to "Intraday & balancing markets". This includes the following:

1. Price convergence

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BEHAVIOUR - BROKER INVOLVEMENT

BEHAVIOUR

At the learning platform there are various cases covering situations with behaviour relating to "Broker involvement" in deal-making. This includes the following:

1. Wash trades & price positioning

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MATERIALS – Documentation

In the field of "Market Abuse" we have made available various reference materials (or materials to be studied):

- 1. Regulations
- 2. Guidance
- 3. Rulebooks
- 4. Sanctions imposed by authorities
- 5. Disciplinary notices
- 6. Miscellaneous

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REGULATIONS – IN THE FIELD OF MARKET ABUSE

In the learning environment you can find various actual legal text documents, including the following regulations:

- 1. US Commodity Exchange Act (CEA)
- 2. US (EISA)
- 3. US (EPA)
- 4. EU Market Abuse Regulation (MAR)
- 5. EU Regulation on Wholesale Energy Market Integrity & Transparency (REMIT)

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GUIDANCE – EXPLANATION OF REGULATIONS & THEIR PROVISIONS

In the learning environment you can find various pieces of guidance to regulations by regulatory authorities, including the following documents:

- 1. ESMA's Guidance on MAR
- 2. ACER's Guidance on REMIT
- 3. ACER's Guidance note Wash trades
- 4. ACER's Guidance note Capacity Hoarding
- 5. ACER's Guidance note Layering & Spoofing
- 6. ACER's (TRUM)

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RULEBOOKS - OF TRADING VENUES

At the learning platform there are various cases in the field of the manipulative scheme "Wash Trades". This includes the following:

- 1. A
- 2. A

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SANCTIONS – IMPOSED BY AUTHORITIES

In this section you can find jurisprudence, as sanctions imposed by authorities are listed, as well as settlements. These cases can be used to learn from, signaling the interpretation of the rules by regulators, understanding where they draw the line and to become aware of aspects you were not even considering. In this section are also included settlements, just for the sake of providing an overview as complete as possible.

- 1. Agency for the Cooperation of Energy Regulators (ACER) & National Regulatory Authorities (NRAs)
- 2. European Securities & Markets Authority (ESMA) & National Conduct Authorities (NCAs)
- 3. Federal Energy Regulatory Commission (FERC)
- 4. Commodity Futures Trading Commission (CFTC)

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DISCPLINARY ACTIONS – BY EXCHANGES (& OTHER TRADING VENUES)

In this section can be found a wide diversity of disciplinary notices and the related sanctions imposed by exchanges (and other venues), as a consequence of a breaching the rulebook of the relevant market place. Hence, this list includes unfair and disorderly behaviours.

- 1. ICE Futures US (120# notices 2011-today)
- 2. ICE Futures Europe (340# notices 2011-today)
- 3. CME Group (135# notices 2011-today)

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