

Clarification on 'ICT services' defined in DORA

Together with other associations¹ APARMA's members would like to emphasize the necessity of establishing an aligned interpretation of the definition of 'ICT services' specified in Article 3(21) of DORA (Regulation (EU) 2022/2554). Since the implementation deadline of DORA is set as 17 January 2025 currently, we strongly urge the ESAs and the European Commission to reinstate the guidance confirming that **regulated financial services (including regulated data reporting services referred to in Article 2(1), points (34), (35) and (36), of Regulation (EU) No 600/2014) should not be treated as ICT services for the purpose of DORA and clarify that regulated financial services include any services and activities subject to the supervision of a financial services regulator including any ancillary or delegated services.**

November 2024

¹ <https://www.fia.org/sites/default/files/2024-10/Joint%20Statement%20on%20ICT%20services%20definition.pdf>

About APARMA

The APA & ARM Association, APARMA, represents common APA and ARM interests on regulations and laws impacting APA and ARM businesses in the EU and UK and the associated supervisory framework to ensure efficient dialogue with regulatory policymakers. APARMA focuses on developing and supporting the adoption of best practices with the common aim of improving industry data quality. APARMA aims to assist authorities and regulators with advice on practicalities related to implementing laws and rules, bearing in mind the practicalities of the data sets involved. Its six members are affiliates of Bloomberg, Cboe Europe, London Stock Exchange, MarketAxess, Nasdaq Nordic and Tradeweb Markets.



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