

Contents

Executive summary: why should global capital be constrained	
by limited exchange trading hours?	3
A century of evolution: A history of US market trading hours	4
What changes could investors expect to see as 24/5 becomes a reality?	6
Impact on market participants	7
Impact to US market regulations	10
Considerations for firms	12
Leveraging AI to navigate the impacts	16
Adapting to extended trading hours: Strategies for success in evolving financial markets	17

Executive summary

Why should global capital be constrained by limited exchange trading hours?

Despite the unprecedented interconnectedness of today's financial markets, global investors still face barriers rooted in the traditional, limited trading hours of US exchanges.

As international participation in US securities surges—foreign ownership reached \$26.86 trillion in June 2023, with equity holdings more than doubling since 2016—investors, especially from Asia, are increasingly seeking access to US markets during their own business hours.1 This raises a fundamental question: Why should global capital flows be restricted by outdated exchange market schedules?

Other asset classes, such as foreign exchange and cryptocurrencies, have already embraced near-continuous trading, enabling investors to respond to global events in real time. US equities markets, while already able to trade overnight via Alternative Trading System (ATS) today, are following suit, with the Securities and Exchange Commission (SEC) recently approving 23-hour trading for 24X

A pivotal step in this transformation is the proposal by the securities information processors (SIPs) to extend their operating hours, pending SEC approval. If enacted, SIPs would operate from 8:00 p.m. ET Sunday through 8:00 p.m. ET Friday, with only a brief technical pause each weeknight.4 This change is essential for supporting continuous trading, as SIPs consolidate and disseminate real-time trade and quote data, facilitating transparency and efficient price discovery across the US equity markets.

The shift to extended trading hours is expected to reduce overnight risk, improve global competitiveness, and empower investors to act on information as it emerges. However, it also brings operational complexity, potential liquidity fragmentation, and new risks around investor protection and regulatory oversight. These realities demand a coordinated response from market participants, regulators, and infrastructure providers.



A century of evolution: A history of US market trading hours

The trading hours of US stock markets have undergone significant changes over the past century, driven by technological advances, globalization, and investor demand for greater access to markets for their capital.

The early 20th century

Total daily trading time: approximately 5 hours

The last 100 years have seen significant upheaval in the trading hours of the listed markets. From the 1920s to the 1940s, trading was conducted entirely on physical trading floors with manual processes, typical from 10 a.m. to 3 p.m. ET. Saturday trading was common until 1952.

Midcentury standardization

Total daily trading time: approximately 6 hours

From 1952 onward, Saturday trading was eliminated entirely, but five hours in a trading day was the status quo up until 1974, when standard hours were reestablished as 10 a.m. to 4 p.m. ET. Indeed, the 1970s saw substantial change for traded markets in the US. It was in this decade that the US saw the introduction of electronic trading systems, and the launch of the Nasdaq in 1971, with similar hours to the New York Stock Exchange (NYSE).

The modern era begins

Total daily trading time: approximately 6.5 hours

In 1985, the NYSE took steps to extend the morning session, opening up the trading floors at 9:30 a.m. ET. This is the advent of the standard US trading hours that the market recognizes today of 9:30 a.m. to 4 p.m. ET.

Extended hours revolution begins pre-market

Total daily trading time: approximately 12 hours

The 1990s saw the advent of pre-market trading for US-listed markets. The Nasdaq introduced a pre-market trading session from 8 a.m. ET in 1991, followed by the NYSE in 1999. Pre-market has evolved since then, with different brokers offering execution from 4 a.m. to 9:30 a.m. ET.

Extended hours revolution continues post-market

Total daily trading time: approximately 16 hours

The market continued moving toward extended hours by introducing a major expansion of after-hours trading from 1999 onward, allowing investors to execute transactions up until 8 p.m. ET. Demand was met by platforms including from alternative trading systems (ATSs) and electronic communication networks (ECNs).

The current trading schedule

Total daily trading time: approximately 16 hours

Market trading hours have remained static since the introduction of after-market trading in 1999. Regular hours open at 9:30 a.m. to 4 p.m. ET, with pre- and post-market hours available for executions.

Era	Daily trading hours	Weekly hours
1920s-1940s	~5	~25
1950s-1970s	~6	~30
1980s-1990s	~6.5	~32.5
2000s to Today	Up to 16	~Up to 80

The transformation represents a more than 300% increase in potential trading access over the past century, fundamentally changing how markets operate and how investors deploy their capital.

The market currently operates Monday through Friday, excluding holidays, from 4 a.m. to 8 p.m. ET, in three trading sessions:⁵

Early hours	Regular hours	After hours
4 a.m9:30 a.m. ET	9:30 a.m4 p.m. ET	4 p.m8 p.m. ET

If extended trading hours are established, the market will operate from Sunday 8 p.m. through Friday 8 p.m., excluding holidays, with the incorporation of one technical pause during each 24-hour period:

Extended early hours	Regular hours	After hours
Conclusion of the pause – 9:30 a.m. ET	9:30 a.m.–4 p.m. ET	4 p.m.–8 p.m. ET

Transitioning to around-the-clock trading is not simply a matter of extending hours. It requires fundamental changes in technology, operations, risk management, and client service. Advanced tools, including Al-driven analytics and automation, will likely be critical to managing the increased complexity and ensuring resilience and efficiency.

This paper explores the rationale for breaking free from limited trading hours; highlights the anticipated changes for investors; and analyzes the impact on market participants, regulations, and infrastructure. It provides strategic considerations for front-office and operations, assesses key factors for affected stakeholders, and offers insights on leveraging technology and AI to navigate the transition. Ultimately, adapting to extended trading hours is not just a technical upgrade—it is a strategic imperative for success in an increasingly dynamic and globally integrated financial marketplace.

What changes could investors expect to see as 24/5 becomes a reality?

As technology continues to evolve, making the most of emerging capabilities is likely to grow in significance. The advantages outlined demonstrate why expanding trading hours could be timely and beneficial.

Increased investor flexibility:

- Investors in different time zones could trade US securities more easily, which may increase liquidity in US markets by reducing the requirement for investors to trade overnight.
- Access to US equities and exchange-traded funds (ETFs) could be enhanced. Participation may be broadened, allowing investors to potentially gain knowledge and insight outside of current trading hours.
- Extended trading hours may improve global flexibility, potentially enabling investors to enter new markets and adapt trading for a more mobile investment strategy.
- Continuous trading would allow investors to access liquidity from a wider range of sources, which may reduce volatility and foster a more resilient and efficient market environment.

Changes to overnight risk:

- Extended trading hours may lower overnight risk by enabling afterhours position adjustments and thereby potentially minimizing unexpected losses or gaps between close and open.
- Greater market responsiveness, enhanced decision-making, and improved risk management are possible as investors can react to news and events in real time, rather than waiting for the next trading day.
- However, lower trading volumes during extended hours could result in wider bid-ask spreads and increased risk, particularly for retail investors who may face less favorable pricing and liquidity.
- Real-time responsiveness to news and events could help stabilize prices and reduce volatility, potentially supporting a more resilient financial ecosystem.

Global competitiveness:

- Extending hours aligns with global exchanges, potentially attracting international investors and enabling cross-market capital movement.
- The 24/5 NMS securities plan from the Chicago Board Options Exchange (CBOE) would mirror its derivatives model, which enables continuous equities trading.⁷
- Extended hours could enhance global integration and competitiveness, potentially enabling real-time price discovery and industry competition.
- Greater alignment of trading hours could enable investors to respond to new information and market events as they happen globally, potentially increasing opportunities for price discovery and resulting in more accurate, transparent securities valuation.

Technology and infrastructure implications:

- The shift to 24/5 trading would require brokers and exchanges to upgrade their technology infrastructure to support continuous market access.
- Investors may need to adopt advanced risk management tools to monitor positions.
- Extended trading hours increase the window for potential cyberthreats, making robust cybersecurity measures and real-time surveillance more critical.
- Institutions that leverage AI and automation to efficiently process real-time data, manage operational complexity, and support decision-making in an always-on market have the opportunity to lead.

Impact on market participants

The implementation of extended market trading hours will impact market participants to varying degrees, but all participants should expect to make changes to account for this transformative change in the US marketplace.



Investors and asset owners

Investors and asset owners may look to their service providers for 24/5 trading access—base expectations of brokerage providers may undergo a fundamental shift.

Buy-side organizations may face fundamental challenges; for example, many market-indexed products are executed at the close or near the end of the trading day, but in a 24-hour global market, the definition of the trading day could become less clear.



Market infrastructure providers

Exchanges and trading venues may need to assess whether their infrastructure can support extended hours and effectively manage the operational challenges associated with providing execution around the clock.

Clearing agencies may need to enhance their risk management frameworks to monitor increased exposure and to upgrade system and technology infrastructure.



Market intermediaries

Prime brokers may need to extend their service hours, enhance their lending businesses and execution capabilities, hedge book management strategies, and provide more continuous client service.

Broker-dealers, including market makers and off-market liquidity providers, may need to adjust their operations to accommodate extended hours, including staffing, trading, and technology infrastructure, to accommodate greater throughput.



Market governance

Self-regulatory organizations may need to review, revise, and update market rules governing best execution, settlement cycles, clearing, and fiduciary regulations to accommodate the proposed changes.

Investors and asset owners

Market users may increasingly seek 24/5 trading access from their service providers, setting the stage for a potential shift in baseline standards across brokerage and investment platforms.

A shift toward 24/5 trading has the potential to introduce market users to a more flexible yet complex environment. Participants may encounter inconsistent liquidity and heightened volatility outside traditional trading hours, with possible implications for trading costs, execution quality, and overall risk exposure. In a 24/5 model, market transparency and real-time information access for participants would be essential to support efficient price discovery and reduce risks of price manipulation. Equal access may also encourage fair valuation, competitive pricing, and narrower spreads across trading sessions. Effective adaptation may involve enhanced risk management, investment in technology, and a deeper understanding of the unique dynamics of continuous trading.

Investors and asset owners may gain the ability to react promptly to global events and adjust positions outside traditional market hours. For retail investors, expanded access has the potential to enable action on overnight news, while also presenting increased risks of impulsive decisions and unexpected losses, especially for those with less experience. Institutional asset owners, such as pension funds and endowments, may encounter challenges executing large trades during off-peak hours due to limited counterparties, which may result in higher transaction costs and greater operational demands for continuous monitoring.

Buy-side firms, including asset managers and hedge funds, may identify new opportunities to generate excess returns by leveraging real-time market developments and adjusting portfolios with greater agility. Realizing these benefits may require significant operational and strategic changes, such as investing in advanced trading systems, real-time analytics, and automation to support continuous oversight. The potential for increased complexity and cost associated with maintaining round-the-clock operations, as well as the need for more sophisticated execution strategies during periods of low liquidity, may become important considerations for these organizations.

Market intermediaries

Market intermediaries may face the need to adjust their operations, prompting changes to staffing models, trading processes, and enhancements to technology infrastructure to support increased throughput and continuous market access.

A shift to 24/5 trading will expose market intermediaries to a significantly more complex environment. Broker-dealers and prime brokers may need to adapt to higher trading volumes to provide a new service for clients across the globe. Success may depend on resilient technology, scalable platforms, and continuous staffing or automation to support operations and maintain best execution.

Broker-dealers may benefit from greater client engagement and new revenue opportunities. Realizing these may require investment in advanced trading platforms to handle increased throughput. Evolving staffing models—through expanded teams or automation—may be needed for continuous support and oversight. Broker-dealers may need to update compliance frameworks to address the complexities of global trading and best execution during periods of lower liquidity. Operational costs and risks associated with wider spreads, higher slippage, and increased market-making exposure during off-peak hours may require careful risk management.

Prime brokers may be positioned to better serve institutional clients by supporting near-continuous market access, acting on global opportunities, responding in real time, and driving greater demand for financing as a result. Ensuring reliability and security of operations may be critical to enable this new standard. Meeting these demands may require substantial investment in technology, expanded staffing for real-time client support, and more sophisticated risk controls to manage extended market and credit exposures.

Market infrastructure providers

Market infrastructure providers may need to ensure their systems are capable of supporting extended trading hours and managing the operational challenges associated with delivering reliable execution and services around the clock.

A transition to 24/5 trading may prompt market infrastructure providers to operate with greater resilience, scalability, and coordination, marrying future-state operational requirements with existing regulatory requirements, such as Regulation SCI.⁸ Exchanges and clearing agencies may need to adapt to the demands of near-continuous market activity, ensuring their platforms and processes are positioned to support additional throughput, maintain data integrity, and deliver reliable performance with minimal downtime. Continuous trading may also call for enhanced risk management frameworks and closer collaboration with market participants and service providers to maintain connectivity and operational stability across global time zones.

Exchanges and trading venues may be positioned at the forefront of this shift, with the potential to unlock new sources of trading activity and revenue by attracting a broader range of participants. Those that provide high-availability platforms may experience increased listings, higher trading volumes, and enhanced market relevance. Achieving these outcomes may require significant technological enhancements, including scalable infrastructure and coordinated efforts with participants to support uninterrupted access and data quality around the clock.

Clearing agencies may have opportunities to improve market efficiency and liquidity by enabling participants to transact and settle trades in response to global events as they occur, potentially reducing settlement bottlenecks and aligning US markets more closely with international standards. However, this shift may introduce operational challenges, as clearing agencies may need to ensure their systems can support continuous operations and adapt risk management frameworks to monitor and mitigate exposures outside traditional trading hours, while minimizing downtime for maintenance or upgrades.

Market governance

Market governance bodies may need to review, revise, and update rules governing best execution, settlement cycles, clearing, and fiduciary responsibilities to ensure these frameworks remain effective and relevant in an extended trading hours environment.

Self-regulatory organizations (SROs) may realize several benefits from a transition to 24/5 trading, while also facing new complexities and risks that warrant careful consideration. Extended trading hours may enable more continuous price discovery and help align US markets with international trading practices. This increased transparency may provide additional insights into market behavior and systemic risk, supporting more informed oversight and policy decisions.

However, a move to 24/5 trading may present significant challenges. SROs may need to adapt their surveillance systems and compliance frameworks to monitor trading activity around the clock, which may strain resources and require substantial investment in technology and staffing. The potential for market manipulation or insider trading may also increase during periods of lower liquidity or reduced oversight, particularly overnight.



Impact on US compliance and regulations

The timing of many current market rules are tied to existing trading hours. Moving to a 24-hour trading cycle with a daily refresh period from 8 a.m. to 9 a.m. ET would require an update to many of these rules.

Exchange rules9

- Currently, this is not a regulatory mandate and—as such—different exchanges will have different views on how to implement extended trading hours.
- To secure competitive advantage, exchanges may look to interpret rules differently, creating inconsistency in the marketplace.
- Exchanges may use different rules and regulations, meaning that firms in the market may require additional rule sets in routing engines depending on the market center/venue to which the order will be routed.

Regulation NMS / FINRA Rule 531010

- Current rule: Broker-dealers must seek the best terms for customer orders—National Best Bid and Offer (NBBO).
- NBBO is calculated and provided by SIPs.
- May make providing best execution more challenging due to thinner liquidity and wider spreads outside traditional trading hours.
- Systems that aggregate, calculate, and disseminate NBBO will need to run for longer periods of time (outside of current market hours).

Volatility moderators¹¹

- The Circuit Breaker Rule mandates that short sales are restricted when a stock drops >10%.
- For transactions that require a reference price, extended trading hours may more frequently push up against these restrictions in times of heightened volatility and thinner markets after hours.
- Timing and thresholds for the Circuit Breaker trigger at certain times of the day and are based on current market hours which would require adjustment based on new trading hours.
- Any regulation or rule that requires a reference price may require careful re-evaluation to confirm no changes are required for future market environment.

Regulatory reporting¹²

- CAT: Order and execution data must be reported by specific times after market close.
- TRACE: OTC fixed-income trades must be reported within a 15-minute window after execution during TRACE hours (tied to market hours).
- Large trader reporting: Daily aggregation is based on trade date, and reports are generated in overnight batch processes.
- Timing requirements for daily regulatory reporting would need to be revisited due to adjusted trading windows.
- TRACE reporting hours and requirements would need to be adjusted to accommodate longer market opening time frame.

SEC Rule (17 CFR 240) 15c3-1: Net Capital¹³

- Current rule: Broker-dealers must maintain minimum net capital.
- Net capital calculations are performed at end of day in batch processes, which is tied to existing trading hours.
- Net capital amounts may be more volatile due to extended trading hours.

Considerations for firms

Strategic considerations for front office and operations in extended trading hours

Implementation planning should involve evaluating industry trends and the competitive landscape, addressing capability gaps, and reviewing vendor agreements to align with new requirements.



· Risk mitigation: Address corporate actions affecting

trading prices.

Analysis of key considerations for impacted market participants

Below is an overview of operational priorities to consider, outlining specific implications for each and identifying the categories of market participants influenced by these changes.

Trading strategy

Algorithm adjustments: • • •

With the transition to T+1 settlement and increasing demand for low-latency execution, organizations may consider adapting their trading algorithms to operate effectively in a faster-paced environment. This may involve recalibrating models to account for shortened settlement cycles and positioning execution strategies to respond in real time to market movements, potentially minimizing settlement risk and optimizing trade outcomes.

Dynamic rebalancing: • •

The evolving market landscape may prompt firms to proactively manage liquidity and volatility. Since extended trading hours may lead to more frequent and unpredictable market shifts, dynamic rebalancing strategies might help organizations navigate sudden changes in market conditions, supporting portfolio alignment with investment objectives while mitigating risks associated with rapid price changes and fluctuating liquidity.

Optimize asset utilization:

Organizations may seek to maximize returns by identifying and capitalizing on securities lending opportunities. With trading potentially occurring over longer periods, there may be increased opportunities to utilize idle assets, along with a greater need to monitor and manage these positions throughout the extended session.

Regulatory and risk impact

Regulatory compliance and processing: • • • •

As regulatory expectations evolve, firms may provide greater transparency in their operations and diversify risk exposures. Extended trading hours may introduce new reporting obligations and prompt updates to compliance workflows for timely and accurate regulatory submissions across trading periods. This may involve updating internal processes and data flows to meet new regulatory reporting requirements, thereby supporting a robust control environment.

Standardization and technology: • • • •

Standardizing data formats and aligning business dimensions across functions may help streamline operations and improve regulatory compliance. Extended trading hours may introduce new reporting obligations and prompt updates to compliance workflows for timely and accurate regulatory submissions. Leveraging technology to harmonize data and processes may help reduce operational complexity and enhance the organization's ability to respond efficiently to regulatory changes.

Policy enhancement and fraud prevention:



Operational impact

Strengthen operations:

To support new market dynamics, firms may enhance their operational infrastructure, including liquidity and collateral management systems. Extended trading hours may put additional strain on these systems, requiring them to be robust and responsive around the clock.

Reengineer processes: • • • • •

Updating standard operating procedures (SOPs) may be important for effective risk mitigation. With a longer trading day, processes might be reengineered to handle increased transaction volumes and operational complexity, supporting accuracy and timeliness.

Automate and manage change: • • • •

Identifying opportunities for automation and planning for seamless transitions may be key to managing operational change. Automation may become even more valuable with extended hours, potentially reducing manual intervention and supporting continuous operations.

Corporate actions: • • • • •

Today, a security undergoing a corporate action will be removed from an ATS overnight to reduce risk of reconciliation errors. In the future, exchanges may not be able to do this and firms may be required to complete all processing in a much more accelerated time frame.

Key

SROs

Market data providers

Exchanges and trading venues

Prime brokers

Broker-dealers

Buy-side firms

Investors and asset owners

Technological impact

System modernization: • • • •

Extended trading hours and evolving market requirements may drive the need for modernization of core systems. Systems may need to ingest intraday pricing data, integrate subledgers, and support automated flows for efficient operation throughout the trading window.

Infrastructure upgrades: • • •

To help maintain system integrity and minimize operational errors, organizations may implement advanced monitoring and automation tools. The increased duration of trading may require infrastructure that can handle higher loads and lower latency, and detect issues in real time, regardless of the hour.

Al and productivity:

Artificial intelligence may play a pivotal role in automating routine tasks and managing market volatility. With extended hours, Al solutions may help maintain productivity and oversight during periods when human resources are limited.

Cloud computing: • • • •

Cloud adoption in financial services may accelerate as institutions seek to modernize infrastructure, support advanced Al-driven applications, and manage increasingly complex global data. The cloud's scalability, reliability, and ability to integrate data from multiple regions may make it essential for effective 24/5 trading operations and regulatory compliance.

Clearing impact

Centralized clearing: • • • •

Managing counterparty risk and preventing unmatched trades may become increasingly important in a fast-moving market. As this will be an optional offering for firms, there remain questions around margining of these positions at clearing agencies, including, will overnight margin requirements be included with the daily requirements, or broken out for those participants who choose to offer overnight trading?

Risk mitigation:

Organizations may proactively address risks arising from corporate actions that affect trading prices. The longer trading window may increase the likelihood of such events impacting trades, prompting vigilant risk mitigation strategies.

Support extended hours: • • •

As trading hours extend, maintaining the safety and efficiency of after-hours trading may become a priority. Organizations may enhance their support mechanisms and monitoring to help maintain market integrity throughout trading sessions.

Extended trading hours demand greater agility, stronger risk controls, and more resilient operations. Organizations should modernize systems, automate processes, and enhance oversight to manage increased complexity and seize new opportunities. Intelligent solutions are now essential for maintaining efficiency, compliance, and competitiveness in this evolving landscape.

Key

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Technology considerations for the organization

When organizations—including but not limited to broker-dealers, exchanges, clearing and settlement organizations, market data providers, and technology vendors—consider a transition to 24/5 trading, several technology considerations may become important. The integration of artificial intelligence (AI), data analytics, blockchain, and automation may present both opportunities and challenges.

The introduction of 24-hour trading may heighten the imperative for organizations to modernize their technology infrastructure and reduce reliance on batch processing systems. This shift may drive demand for agile platforms capable of adapting to dynamic market conditions and underscores the importance of adopting emerging, resilient technologies.

System modernization may become increasingly important to support extended trading hours, prompting organizations to consider core systems that process intraday data, integrate subledgers, and automate workflows. Upgrading infrastructure with advanced monitoring and automation tools may help provide system reliability and real-time issue detection under increased trading loads. Artificial intelligence may further enhance productivity by automating routine tasks and managing market volatility, especially during periods with limited human oversight.

Cloud adoption in financial services will continue to accelerate as banks seek to modernize infrastructure, support advanced Aldriven applications, and manage increasingly complex global data. The cloud's scalability, reliability, and ability to integrate data from multiple regions may make it valuable for seamless 24/5 trading operations and regulatory compliance. As more banks move to the cloud, they may gain access to powerful analytics, reduced latency, and enhanced security, positioning themselves to innovate and compete in a rapidly evolving market. When implementing 24/5 cloud-based trading, organizations may focus on three key areas: determining regulatory compliance through impact assessments, ongoing engagement, and advisory on compliance architecture; developing a market data strategy that includes data commercialization, streaming infrastructure, and monetization of derived analytics; and building strong technical infrastructure with a clear cloud migration roadmap, optimized latency and hybrid co-location design, and resilient disaster recovery and highavailability solutions.

Technology is key to the transformation



Develop a clear understanding and assessment of the current-state technology environment to reduce technology debt within an organization.



By providing a decentralized and immutable ledger, blockchain could facilitate faster settlement times and reduce the risk of fraud, making it easier to maintain continuous trading.



Automation of manua process flows will play vital roles.



Advanced cybersecurity measures, including encryption, multi-factor authentication, and continuous monitoring, are essential to protect trading platforms and sensitive data from cyber or insider threats.



Increased adoption of cloud technology enables scalable, reliable and globally accessible trading platforms, supporting seamless 24/5 operations, reducing latency, and ensuring regulatory compliance.

Leveraging AI to navigate the impacts

The extension of trading hours would introduce a range of potential impacts. Al will be instrumental in navigating through these challenges.

Liquidity management

- Predictive forecasting: Machine learning (ML) models can forecast cash needs in real time.
- Autonomous monitoring and rebalancing: Al agents can monitor and rebalance liquidity across accounts.
- Anomaly detection: Unsupervised ML can flag unusual liquidity flows for rapid response.

Platforms use Al-powered analytics to forecast cash positions and optimize liquidity in real time.

Resourcing

- Dynamic workload allocation: Al agents can assign tasks and optimize shifts globally.
- 24/7 Al chatbots: Natural language programming (NLP) chatbots can automate support and escalate complex queries.
- Predictive staffing: ML models can forecast workload spikes and optimize scheduling.

Intelligent automation solutions leverage AI to dynamically allocate workforce resources based on workload and business priorities.

Collateral management

- Real-time valuation and optimization: ML models can value and allocate collateral instantly.
- Autonomous inventory management: Al agents can monitor, allocate, and substitute inventory.
- Data harmonization: ML can unify and de-duplicate data across sources.

Platforms employ machine learning to optimize collateral allocation, monitor margin requirements, and automate related workflows.

Security setup and pricing

- Automated setup and validation: Al agents can ingest and validate security data.
- Real-time price discovery: ML models can predict prices and flag anomalies.
- Large language model (LLM) data extraction: LLMs can extract and validate key fields from documents.

Platforms enrich security master data and deliver accurate, real-time pricing using advanced analytics.

Trade reconciliation

- Automated matching: ML and rule-based algorithms can reconcile trades and manage exceptions.
- Exception management: Al agents can classify and escalate breaks.
- Bottleneck forecasting: Predictive analytics can alert teams to highrisk periods.

Trade reconciliation is increasingly automated with tools that apply AI and ML to streamline trade matching, detect anomalies, and resolve exceptions efficiently.

Regulatory reporting

- Real-time data aggregation: Al agents can aggregate, validate, and format data for compliance.
- Anomaly detection: ML models can flag reporting errors in real time
- LLM-driven report generation: LLMs can extract and generate regulatory reports from unstructured data.

Platforms incorporate Al to automate data aggregation and compliance, and generate timely regulatory reports.

Adapting to extended trading hours: Strategies for success in evolving financial markets

Adapting to extended trading hours may unlock new opportunities, prompt a focus on operational excellence, and position firms for potential future market leadership.

The extension of trading hours may represent a significant shift in the financial markets, presenting both challenges and opportunities. Organizations may consider adapting their trading strategies, operational processes, technology infrastructure, and risk management frameworks to thrive in this evolving environment. By modernizing systems, automating processes, and enhancing oversight, organizations may be able to manage increased complexity and pursue new opportunities.

Embracing extended trading hours may enable firms to react in real time to global events, optimize asset utilization, and potentially enhance returns. However, all of this will come at a cost that larger firms may be able to accommodate, leaving the risk that smaller firms could be at a competitive disadvantage if they

are unable to make the anticipated changes to offer this service to customers. Firms across the market are already taking steps to understand if the demand for extended trading hours will render this a profitable enterprise. Leveraging advanced technologies, particularly AI, may be important for navigating these changes and maintaining a competitive edge. Organizations that proactively adapt to these extended hours may be better positioned to mitigate risks and unlock new sources of value, supporting growth and innovation in the financial markets.

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Endnotes

- 1. Cboe, "What does it take to offer around the clock equities trading?," February 2, 2025.
- 2. Ibid; US Securities and Exchange Commission (SEC), "Statement on the Commission's approval of the 24X National Exchange application for registration as a national securities exchange," November 26, 2024.
- 3. Nasdaq, "Nasdaq's view: The road to 24-hour trading," June 16, 2025.
- 4. Nasdaq Trader, "The Securities Information Processors move toward 24-hour availability, pending SEC approval," press release, May 6, 2025.
- 5. Ibid.
- 6. James Langton, "CFTC consults on 24/7 trading," Investment Executive, April 22, 2025.
- 7. Cboe, "Early birds and night owls: How extending trading hours are reshaping US equities markets," March 28, 2025.
- 8. Code of Federal Regulations (CFR), Regulation SCI—Systems Compliance and Integrity, 17 CFR Part 242, last amended July 1, 2025.
- 9. CFR, Regulation T, 12 CFR Part 220—Credit by Brokers and Dealers, last amended July 21, 2025; Financial Industry Regulatory Authority (FINRA), Rule 4210 Margin Requirements, accessed September 2025.
- 10. CFR, Regulation NMS, SEC, June 29, 2005; FINRA, Rule 5310 Best Execution and Interpositioning, accessed September 2025.
- 11. CFR, Regulation SHO—Regulation of Short Sales, 17 CFR Part 242, last amended July 1, 2025.
- 12. FINRA, Consolidated Audit Trail (CAT), accessed September 2025; FINRA staff, "What is TRACE and how can it help me?," The Motley Fool, October 26, 2023.
- 13. CFR, Regulation SCI, <u>17 CFR Part 240.15c3-1c Consolidated computations of net capital and aggregate indebtedness for certain subsidiaries and affiliates</u>, last amended July 1, 2025.



Together makes progress

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