Introduction of Market Access Rule, etc.

January 30, 2020

Osaka Exchange, Inc.

I. Purpose

The recent automation and acceleration of transactions by market participants has raised the importance for trading participants to conduct appropriate order management. Given such background, Osaka Exchange, Inc. (OSE) will partially revise the rules concerning order management systems at trading participants from the viewpoint of further improving the stability and reliability of the market.

II. Outline

| Item | Contents | Remarks |
|-------------------------------|--|---|
| 1. Requirement for Direct and | · Trading participants must have direct and exclusive risk | Examples of specific management methods would be as |
| Exclusive Risk Management | management control over customer orders with regard to | follows: |
| Control over Customer Order | restriction and measures. | - Use of a system independently developed by the trading |
| Restriction and Measures | The term "direct and exclusive" refers to a situation where only | participant and located in a place physically separated |
| | the trading participant can manage the restrictions or measures | from the customer system. |
| | on customer orders with regard to the management of such | - Use of a risk check solution provided by an independent |
| | orders (e.g., setting and modifying risk parameters, etc.) and its | third-party (e.g., vendor and OSE(TradeGuard)), etc. |
| | customers cannot alter such settings, etc | (limited to the case where the trading participant has direct |
| | | and exclusive management authority over its use) |
| | | In cases where software for risk checks required by the |
| | | trading participant is installed on a system managed by the |
| | | customer, and the trading participant confirms that the |
| | | settings and parameters are not changed, such an |
| | | arrangement is considered as indirect management, not |

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| | | direct and exclusive management. (Cases such as where |
| | | the customer has entered into a contract, etc. in advance |
| | | not to change the settings and parameters are also |
| | | considered as indirect management.) |
| 2. Requirement to Introduce | · If an irregular order is unexpectedly placed, etc. due to a | Securities companies that accept orders for Low Latency |
| Functions to Prevent Order | situation such as an order placement system malfunction | Trading will continue to be required to implement |
| Placement | (including customer-side system malfunction), the trading | measures based on the checklist as requested in the notice |
| | participant must immediately implement measures to prevent | entitled "Introduction of J-GATE Checklist Pertaining to |
| | the placement of new orders to OSE. | Management System of Trading Participants Accepting |
| | | Low-Latency Trading Orders, etc." (OSE Market |
| | | Planning No.19; Mar. 29, 2019) |
| 3. Prohibition of Order | OSE will clarify in its guidelines that trading participants must | For example, trading participants will be prohibited from |
| Management Methods That | appropriately handle, in their systems, orders that breach the | adopting order management methods that employ |
| Involve Deliberate Placement of | order limits, etc. they specified. | techniques that allow the overwriting of parameters, etc. |
| Erroneous Orders, etc. | | to place orders that will obviously be returned as errors by |
| | | the OSE system. |
| | | · Prohibition of such order management methods will be |
| | | clearly stipulated in the Order Management Guidelines. |

III. Implementation Date (tentative)

These revisions will be implemented in January 2021.

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