SECURITIES DEALING SERVICES:
SINGAPORE MARKET ANNEX

1. Definitions and Interpretation

1.1 In this Securities Dealing Services: Singapore Market Annex, including the Schedule, capitalised terms have the meaning given to them in the "CLSA Asia-Pacific Terms of Business" (the "**Terms of Business**") and the Securities Dealing Services Annex. In addition, the following capitalised terms have the following meaning:

"Capital Markets Products" means any securities, units in a collective investment scheme, derivatives contracts, spot foreign exchange contracts for the purposes of leveraged foreign exchange trading, and such other products prescribed by the MAS.

"**CDP**" means The Central Depository (Pte) Limited.

"**Clearing Rules**" means the CDP Clearing Rules, including applicable Directives, Regulatory Notices and Circulars, as amended, modified, supplemented or replaced from time to time.

"**CSI Group**" means CITIC Securities International Company Limited and its direct and indirect subsidiaries from time to time.

"**MAS**" means the Monetary Authority of Singapore.

"**Rules**" means the Rules of the SGX-ST.

"**SGX**" means the Singapore Exchange Limited.

"**SGX-ST**" means the Singapore Exchange Securities Trading Limited.

"**Sponsored Access**" means a form of direct market access in which we permit you to use our member ID of the SGX-ST to transmit DMA Orders for execution directly to SGX-ST without using our infrastructure.

1.2 This Securities Dealing Services: Singapore Market Annex is referred to herein as "this Annex".

1.3 References in this Annex to "we", "us" and "our" mean the relevant contracting entity under the Terms of Business and, where the context expressly requires, may include other members of the CSI Group.

2. Effect of Terms of Business; Amendment

2.1 This Annex shall apply to you if (a) you requested in your Application Form that we provide you with Securities Dealing Services and requested that such Securities Dealing Services be provided in respect of the Singapore Market; (b) we currently provide you with Securities Dealing Services in respect of the Singapore Market; or (c) your account is opened with CITIC Securities Singapore Pte. Ltd..

2.2 The terms and conditions set out in this Annex shall apply to all Securities Dealing Services in the Singapore Market or through an account opened with CITIC Securities Singapore Pte. Ltd. provided by us to you in addition to, and supplemental to, the terms and conditions set out in the Terms of Business and in the Securities Dealing Services Annex. Accordingly, the terms and conditions in this Annex are legally binding and take effect when you signify your acceptance by placing an order for securities in the Singapore Market with us or through an account opened with CITIC Securities Singapore Pte. Ltd. following your receipt of our Terms of Business, the Securities Dealing Services Annex and this Annex.

2.3 These terms may be amended and/or supplemented from time to time, in accordance with the Terms of Business. You agree that the terms on which we will provide services to you will apply to any Underlying Principals you represent.

3. Market Requirements

3.1 Without limitation to your obligations under the Terms of Business and the Securities Dealing Services Annex, you will comply at all times with the Market Requirements and the applicable rules and regulations of the SGX-ST and every other securities market in which we conduct transactions for you.

3.2 You agree that we may:-

3.2.1 do all such acts and things, including (without limitation) the provision of information to the relevant authorities and regulators and advising or assisting such authorities and regulators in respect of any buying-in of securities in a short sale, in order to comply with obligations imposed on us by applicable laws, Market Requirements and legal process; and

3.2.2 in the provision of services by us hereunder (including as to entering into and terminating transactions) deal with your account and assets in a manner so as to comply with applicable laws, Market Requirements and trading and clearing rules in all relevant jurisdictions (including in a manner consistent with market industry practice) from time to time.

3.3 You further agree that you shall seek advice on and be aware of the laws and Market Requirements in your own country and in each jurisdiction in which you may from time to time require us to provide services to you hereunder (including as to the prohibited securities transactions and insider dealing), and we shall not be liable for any loss or liability imposed on you as a result of non-compliance with such laws, Market Requirements and applicable legal process.

4. Securities Positions and Reporting Limits

Singapore law prescribes, among other matters, certain disclosure requirements on interests in securities acquired. In addition, there are potential take-over and other obligations in the event that your holdings in securities exceed stipulated percentages. You will, if applicable, have to comply with these. Please take legal and other professional advice regarding your obligations thereunder and under Market Requirements generally. You acknowledge that it is your responsibility to observe such position limits, to monitor your holdings and to make reports where applicable.

5. Direct Market Access

5.1 Without prejudice to the provisions of the Asia-Pacific Direct Market Access Services Annex, the terms of this paragraph 5 shall apply to the Direct Market Access Services in respect of SGX-ST Trading on the SGX.

5.2 You have confirmed that you have appropriate procedures in place to ensure that all persons authorised by you to place DMA Orders or in respect of the Direct Market Access Services:

5.2.1 are familiar with, and comply with, the relevant Rules of the SGX-ST; and

5.2.2 have knowledge and proficiency in the use of the CLSA System.

5.3 You acknowledge and agree that, as required under the Rules of the SGX-ST, you have to meet certain minimum standards, including standards on financial standing, credit history and criminal records, adverse records or pending court proceedings relating to prohibited market conduct, at all times.

5.4 You have confirmed that:

5.4.1 you have been provided with relevant information concerning your access to the electronic trading system for the automatic matching of orders designated and approved by the SGX-ST for transactions on the SGX-ST and the Market Requirements;

5.4.2 you are, at all times, subject to a legally binding agreement governing the terms and conditions of the Direct Market Access Services;

5.4.3 you have security arrangements in place to ensure that all unauthorised persons are denied access to the Direct Market Access Services; and

5.4.4 you will assist the SGX-ST in any investigation into any potential violations of the Rules of the SGX-ST and any applicable laws. Such assistance shall be timely and shall include, but is not limited to, the provision of information to the SGX-ST relating to the identity and address of any person who may be responsible for the execution of an order or trade.

5.5 You may not delegate or permit any use of the Direct Market Access Services to any persons other than your own authorised persons without our prior written approval. Where you delegate or permit any use of the Direct Market Access Services to any such persons with our prior written approval as aforesaid, you will ensure that such persons are subject to, and will comply with, all the requirements set out in paragraphs 5.2, 5.3 and 5.4 of this Annex.

5.6 Where we authorise Sponsored Access for your use as permitted under the Rules of the SGX-ST, we may require such conditions as required by the Rules of the SGX-ST or as we deem necessary. You may not permit any use of Sponsored Access to any persons other than your own authorised persons without our prior written approval. Where we authorise Sponsored Access for your use, you undertake to comply with the requirements set out in Rules 4.1 and 4.13 and the applicable Regulatory Notices and any other requirements relating to order management systems prescribed by the SGX-ST from time to time.

5.7 Subject to the delegation conditions in Rule 4.2.3(g), where you authorise or permit any use of Sponsored Access to any persons with our prior written approval, you will have measures in place to ensure that all such persons granted with Sponsored Access will comply with the requirements set out in Rules 4.1 and 4.13 and the applicable Regulatory Notices and any other requirements relating to order management systems prescribed by the SGX-ST from time to time.

5.8 You acknowledge and agree that, as required under the Rules of the SGX-ST, we maintain a register recording the identities, addresses and other information of its customers and all other persons granted with Sponsored Access by its customers; and such register must be produced to the SGX-ST at such time as the SGX-ST requires. You agree to have your identity, address and other information prescribed by the SGX-ST entered on the register. Where you authorise or permit any use of Sponsored Access to any persons, you undertake to ensure that all such persons granted with Sponsored Access will be notified to us and included in the register in the prescribed manner before any trading via Sponsored Access commences.

5.9 Without prejudice to the provisions of the Asia-Pacific Direct Market Access Services Annex, we may immediately suspend or terminate your access to the Direct Market Access Services at any time as directed by the SGX-ST, or when necessary for the fulfilment of our duties under the Rules or for any other reason, in accordance with Rule 4.3.2.

6. Disclosure Statement

You have confirmed (whether in the Application Form or otherwise) that you acknowledge and confirm that the terms and conditions applicable to the Services and the disclosure statements in the "Disclosure Statement Schedule" to this Annex are and have been fully explained to you in a language that you understand and that you have read and understood them.

7. Risk Disclosure Statement

You have confirmed that you have read, understood and provided your written consent to the matters set out in the "Risk Disclosure Statement (Rule 4.16.1 of the SGX-ST Rules)" to this Annex.

8. Indemnity

You agree that you undertake to indemnify us in respect of any liabilities, costs, damages and losses incurred by us due to any transaction effected by you or by your omission or failure to undertake any action required of you under this Annex, the Terms of Business, the Securities Dealing Services Annex, applicable laws, Market Requirements and legal process.

Securities Dealing Services: Singapore Market Annex
Disclosure Statement Schedule

This Disclosure Statement Schedule does not disclose all of the risks and other significant aspects of dealing in capital markets products that are securities. In light of the risks, you should undertake such transactions only if you understand the nature and fundamentals of the transactions and the markets underlying such transactions, the nature and the scope of the contractual relationships into which you are entering, the legal terms and conditions of the documents for the transactions, the extent of your exposure to risk and the potential losses that can be incurred, the income tax treatment and the accounting treatment of the transactions (which can be complex) and the regulatory treatment of the transactions. You should carefully consider whether trading is appropriate for you in light of your experience, objectives, financial resources, ability to bear risks and other relevant circumstances. Please read this Schedule carefully, and ask questions and take independent advice as you consider appropriate.

Part A: Notification of Rules 1.1.1 to 1.1.4 of the Clearing Rules

We are required by the Clearing Rules to notify you of the following rules of the Clearing Rules.

Reproduction of Rules 1.1.1 to 1.1.4 of the Clearing Rules

1.1.1 These Clearing Rules apply to all Exchange Trades that are cleared or settled through CDP. The Clearing Rules operate as a binding contract between CDP and each Clearing Member, and between a Clearing Member and any other Clearing Member.

1.1.2 These Clearing Rules shall come into effect on the Effective Date.

1.1.3 Except where CDP, SGX RegCo, or any person or entity referred to under Rule 1.1.7 otherwise expressly agrees with or expressly commit to any party, the benefit of any performance of obligations under these Clearing Rules and/or Clearing Directives is restricted only to Clearing Members. None of CDP, its related corporations, SGX RegCo, any person or entity referred to under Rule 1.1.7, or their respective directors, officers, employees, representatives or agents (the "Relevant Persons") shall be liable to any other party (including Trading Members). In particular, the Relevant Persons shall have no liability to any party affected or aggrieved by any alleged action or omission.

1.1.4 All Clearing Members are to note the foregoing and ensure that they are taking on membership, and/or carrying on business, as Clearing Members, and that they transact and will transact by reference to CDP or upon information or action referable to CDP, only on the foregoing basis, and will also ensure that they will not open or allow the continued operation of any account for any person with respect to any transaction unless such person has been notified of the foregoing provisions and has satisfied itself that the same is acceptable and accepts the same.

Part B: Sections 274, 275 and 276 of the Securities and Futures Act

This Part explains the effect of sections 274, 275 and 276 of the Securities and Futures Act 2001 (the "**SFA**").

In summary, sections 274 and 275 provide that, where the conditions set out therein are satisfied, an offer of securities, which includes shares, debentures or units in a business trust, or an offer of securities-based derivatives contract, such as exchange-traded warrants, is exempted from the prospectus registration requirements of the SFA.

In other words, where securities or securities-based derivatives contracts are offered to you in reliance of the prospectus exemptions in section 274 and/or section 275, the applicable prospectus requirements under the SFA do not apply, subject to the scope and conditions of the relevant exemption. This does not itself disapply separate SGX-ST listing or disclosure requirements.

Section 274

Section 274 of the SFA provides that offers of securities or securities-based derivatives contracts may be made to "institutional investors" as defined in section 4A(1)(c) of the SFA and the applicable Classes of Investors Regulations, including the following classes without a prospectus having to be registered:

(i) the Singapore Government or a specified statutory board as set out in the Second Schedule to the Securities and Futures (Classes of Investors) Regulations 2018 ("**SFR**");

(ii) an entity that is wholly and beneficially owned, whether directly or indirectly, by a central government of a country and whose principal activity is to manage its own funds or the funds of the central government of that country or the funds of another entity that is wholly and beneficially owned, whether directly or indirectly, by the central government of that country;

(iii) any entity that is wholly and beneficially owned, whether directly or indirectly, by the central government of a country; and whose funds are managed by an entity mentioned in sub-paragraph (ii);

(iv) foreign central government, central bank or central government agency;

(v) a multilateral agency, international organisation or supranational agency as set out in Third Schedule of the SFR;

(vi) MAS regulated entities:

a) a bank that is licensed under the Banking Act 1970;
b) a merchant bank that is licensed under the Banking Act 1970;
c) a finance company that is licensed under the Finance Companies Act 1967;
d) a company or co-operative society that is licensed under the Insurance Act 1966 to carry on insurance business in Singapore;

e) a company licensed under the Trust Companies Act 2005;
f) a holder of a capital markets services licence;
g) an approved exchange;
h) a recognised market operator;
i) an approved clearing house;
j) a recognised clearing house;
k) a licensed trade repository or foreign trade repository;
l) an approved holding company;
m) a Depository as defined in section 81SF of the SFA;

(vii) an entity or a trust formed or incorporated in a jurisdiction other than Singapore, which is regulated for the carrying on of any financial activity in that jurisdiction by a public authority of that jurisdiction that exercises a function that corresponds to a regulatory function of the Authority under the SFA, the Banking Act 1970, the Finance Companies Act 1967, the Financial Services and Markets Act 2022, the Monetary Authority of Singapore Act 1970, the Insurance Act 1966, the Trust Companies Act 2005 or such other Act as may be prescribed by regulations made under section 341 of the SFA;

(viii) a pension fund, or collective investment scheme (as defined in section 2 of the SFA), whether constituted in Singapore or elsewhere;

(ix) a person (other than an individual) who carries on the business of dealing in bonds with accredited investors or expert investors;

(x) a designated market-maker;

(xi) a headquarters company or Finance and Treasury Centre which carries on a class of business involving fund management, where such business has been approved as a qualifying service in relation to that headquarters company or Finance and Treasury Centre under section 43E(2)(a) or 43G(2)(a) of the Income Tax Act 1947;

(xii) a person who undertakes fund management activity (whether in Singapore or elsewhere) on behalf of not more than 30 qualified investors;

(xiii) a Service Company which carries on business as an agent of a member of Lloyd's;

(xiv) a corporation the entire share capital of which is owned by an institutional investor or by persons all of whom are institutional investors; or

(xv) a partnership (other than a limited liability partnership within the meaning of the Limited Liability Partnerships Act 2005) in which each partner is an institutional investor.

Section 275

Section 275 of the SFA provides that an offer of securities or securities-based derivatives contracts may, subject to the applicable conditions in section 275(1) or (1A), be offered without a prospectus to:

(a) a "**relevant person**" (as defined below); or

(b) a person who acquires the securities or securities-based derivatives contracts as principal if the offer is on terms that the securities or securities-based derivatives contracts may only be acquired at a consideration of not less than S$200,000 (or its equivalent in a foreign currency) for each transaction, whether such amount is to be paid for in cash or by exchange of securities, securities-based derivatives contracts or other assets;

(together, the "**Section 275 Persons**").

A "**relevant person**" is defined as:

(a) an accredited investor, namely:

(i) an individual whose —

(A) net personal assets exceed in value S$2 million (or its equivalent in a foreign currency), with the value of the individual's primary residence taken to be the lower of S$1 million and its estimated fair market value less outstanding amounts under credit facilities secured by the residence;

(B) financial assets (net of any related liabilities) exceed in value S$1 million (or its equivalent in a foreign currency); or

(C) whose income in the preceding 12 months is not less than S$300,000 (or its equivalent in a foreign currency);

(ii) a corporation with net assets exceeding S$10 million in value, as determined by —

(A) the most recent audited balance-sheet of the corporation; or (B) where the corporation is not required to prepare audited accounts regularly, a balance-sheet of the corporation certified by the corporation as giving a true and fair view of the state of affairs of the corporation as of the date of the balance-sheet, which date shall be within the preceding 12 months;

(iii) the trustee of any trust where —

(A) all the beneficiaries of which are accredited investors;

(B) all the settlors of which are accredited investors, and have settlor reserved powers and revocation powers;

(C) the subject matter of which exceeds S$10 million in value;

(iv) an entity (other than a corporation) with net assets exceeding S$10 million in value;

(v) a partnership (other than a limited liability partnership) in which every partner is an accredited investor;

(vi) a corporation the entire share capital of which is owned by accredited investors; or

(vii) a person who holds a joint account with an accredited investor, in respect of dealings through that joint account.

(b) a corporation the sole business of which is to hold investments and the entire share capital of which is owned by one or more individuals, each of whom is an accredited investor (a "**Relevant SPV**");

(c) a trustee of a trust the sole purpose of which is to hold investments and each beneficiary of which is an individual who is an accredited investor (a "**Relevant Trust**");

(d) an officer or equivalent person of the person making the offer (such person being an entity) or a spouse, parent, brother, sister, son or daughter of that officer or equivalent person; or

(e) a spouse, parent, brother, sister, son or daughter of the person making the offer (such person being an individual).

Section 276

Where securities or securities-based derivatives contracts have been sold to you pursuant to the prospectus exemptions in section 274 or section 275, section 276, subject to the exceptions in section 276(7), imposes restrictions on your ability to subsequently on-sell those securities.

Subject to section 276(7), under section 276, within a period of **six months** from the date of your initial acquisition of such securities or securities-based derivatives contracts, you may only subsequently sell the securities or securities-based derivatives contracts to institutional investors or to Section 275 Persons. Subject to the applicable statutory exceptions, a sale to other persons within that period brings the resulting offer within the applicable requirements of Subdivisions (1A), (2) and (3) of Division 1 of Part 13 of the SFA.

Subject to section 276(7), in addition, no transfer of securities or securities-based derivatives contracts of a Relevant SPV (other than a Relevant SPV which is itself an accredited investor) and the beneficiaries' rights and interest in a Relevant Trust (other than a Relevant Trust the trustee of which is an accredited investor) may be made within **six months** after such Relevant SPV or Relevant Trust has acquired the securities or securities-based derivatives contracts under section 275, unless:

(a) the transfer is made to institutional investors or relevant persons as defined in section 275(2), or arises from an offer referred to in section 275(1A); for a Relevant Trust, the permitted consideration-based transfer is governed specifically by section 276(4)(c)(ii);

(b) no consideration is or will be given for the transfer; or

(c) the transfer is by operation of law.

Part C: Financial advisory services for institutional investors / accredited investors / expert investors

We hereby notify you that in view of your status as an institutional investor, accredited investor or expert investor (and, where applicable, subject to your having been treated as such following any opt-in, notification or consent procedure required under the applicable regulations) (each as defined under the Financial Advisers Regulations), we may, to the extent that the applicable conditions for the relevant exemption are satisfied, be exempt from complying with certain requirements under the Financial Advisers Act 2001 ("**FAA**"), the Financial Advisers Regulations and the relevant Notices and Guidelines issued thereunder, in respect of any financial advisory service which we may provide to you. In particular, when providing financial advisory services to you, the following requirements may not apply, to the extent of the relevant exemption under the FAA, the Financial Advisers Regulations or the applicable Notice or Guidelines:

- section 34 of the FAA (relating to the disclosure of material information on designated investment products);
- section 36 of the FAA (which requires that there must be a reasonable basis for recommendations);
- section 45 of the FAA (which requires the disclosure of interests when making recommendations on specified products in a circular or other similar written communication);
- MAS Notice on Recommendations on Investment Products (Notice FAA-N16) (which sets out requirements which are to be complied with when a financial adviser makes recommendations on investment products to clients);
- MAS Notice on Information to Clients and Product Information Disclosure (Notice FAA-N03) (which sets out the minimum standards a financial adviser should meet in
its product disclosures and information to clients, and the type of information which must be disclosed by such financial adviser to its clients);
- MAS Guidelines on Switching of Designated Investment Products (which provide guidance on the controls, processes and procedures that the MAS requires a financial adviser to implement in order to monitor switching and ensure that its representatives do not advise clients to switch from one designated investment product to another designated investment product in a manner that would be detrimental to its clients).

Part D: Prohibited Trading Practices

We are required by Rules 4.2.3 and 4.18 of the SGX-ST Rules to have measures in place to assure that our clients are familiar with the SGX-ST Rules and applicable laws, and in the case of accredited investors, institutional investors and expert investors, to provide you with adequate information in relation to prohibited trading practices.

Section 197 of the SFA: False Trading and Market Rigging Transactions

A person must not do anything, cause anything to be done or engage in any course of conduct with a purpose of creating a false or misleading appearance, or that creates or is likely to create such an appearance where the person knows or is reckless as to that consequence –

- of active trading in any capital markets products on an organised market; or
- with respect to the market for, or the price of, any capital markets products traded on an organised market,

These are the purpose-based and knowledge/recklessness-based prohibitions in section 197(1) and (1A), respectively.

No person shall, by means of any purchase or sale of any capital markets products that do not involve a change in the beneficial ownership of those capital markets products, or by any fictitious transaction or device, maintain, inflate, depress, or cause fluctuations in, the market price of any capital markets products.

Section 198 of the SFA: Market manipulation in relation to securities and securities-based derivatives contracts

A person must not effect, take part in, be concerned in or carry out, directly or indirectly, two or more transactions in securities or securities-based derivatives contracts of a corporation or business trust that have, or are likely to have, the effect of raising, lowering, maintaining or stabilising their price on an organised market, with intent to induce other persons to subscribe for, purchase or sell those products. For corporation products, the inducement prohibition also extends to products of a related corporation. Section 198(3) also includes offers and invitations within its references to transactions.

Section 199 of the SFA: False or Misleading Statements

No person shall make a statement, or disseminate information, that is false or misleading in a material particular and is likely –

- to induce other persons to subscribe for securities, securities-based derivatives contracts or units in a collective investment scheme;
- to induce the sale or purchase of securities, securities-based derivatives contracts or units in a collective investment scheme by other persons; or
- to have the effect (whether significant or otherwise) of raising, lowering, maintaining or stabilising the market price of securities, securities-based derivatives contracts or units in a collective investment scheme,

if, when he makes the statement or disseminates the information, he does not care whether the statement or information is true or false, or he knows or ought

reasonably to have known that the statement or information is false or misleading in a material particular.

Section 200 of the SFA: Fraudulently Inducing Persons to Deal in Capital Markets Products

No person shall –

- by making or publishing any statement, promise or forecast that he knows or ought reasonably to have known to be misleading, false or deceptive;
- by any dishonest concealment of material facts;
- by the reckless making or publishing of any statement, promise or forecast that is misleading, false or deceptive; or
- by recording or storing in, or by means of, any mechanical, electronic or other device information that he knows to be false or misleading in a material particular,

induce or attempt to induce another person to deal in capital markets products.

Section 201 of the SFA: Employment of manipulative and deceptive devices

No person shall, directly or indirectly, in connection with the subscription, purchase or sale of any capital markets products –

- employ any device, scheme or artifice to defraud;
- engage in any act, practice or course of business which operates as a fraud or deception, or is likely to operate as a fraud or deception, upon any person;
- make any statement he knows to be false in a material particular; or
- omit to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading.

Section 202 of the SFA: Dissemination of information about illegal transactions

A person must not circulate or disseminate, or authorise or be concerned in circulating or disseminating, statements or information that prices will or are likely to rise, fall or be maintained because of transactions or other acts which, to that person's knowledge, contravene or would contravene the provisions specified in section 202(1), where either condition below is satisfied. The relevant provisions are sections 197, 198, 199, 200 and 201 for corporation or business-trust securities and securities-based derivatives contracts (including relevant related-corporation acts), and sections 197, 200, 201, 201A and 201B for classes of derivatives contracts or spot foreign exchange contracts for leveraged foreign exchange trading:

- the person, or a person associated with the person, has entered into or purports to enter into any such transaction or has done or purports to do any such act or thing; or

- the person, or a person associated with the person, has received, or expects to receive, directly or indirectly, any consideration or benefit for circulating or disseminating, or authorising or being concerned in the circulation or dissemination, the statement or information.

Section 204 of the SFA: Penalties

Subject to section 204(2), an individual who contravenes the provisions summarised above shall be guilty of an offence and shall be liable on conviction to a fine not exceeding S$250,000 or to imprisonment for a term not exceeding 7 years or to both. Under section 333(1), a corporation convicted of an offence under section 204 may be fined up to S$500,000; the individual imprisonment provision does not apply to the corporation.

Please refer to Division 1 - Prohibited Conduct - Capital Markets Products, Part 12, Market Conduct, of the SFA (including any applicable defences, safe harbours and exemptions) for more details on the prohibited trading practices.

Part E: Short Selling

Marking of Sell Orders

Subject to applicable exemptions, section 137ZJ of the SFA requires a person making a short sell order on an approved exchange to disclose, before or at the time of the order, that it is a short sell order and the quantity, volume or value of the specified capital markets products to be sold in which the person does not have an interest. Where we place the order on your behalf, you must provide that information to us before or at the time of the order, and we must disclose it to the approved exchange in accordance with section 137ZJ(3). Contravention of section 137ZJ(1) or (3) is an offence carrying a fine not exceeding S$25,000, subject to section 333 for corporations.

The accurate disclosure of sell orders is necessary for factual information to be provided to market participants regarding short selling. As such information may be taken into account by investors when making trading decisions, it is important that false or misleading information not be presented.

Section 330(1) of the SFA states that any person who, with intent to deceive, makes or furnishes, or knowingly and wilfully authorises or permits the making or furnishing of, any false or misleading statement or report to any approved exchange, licensed trade repository, approved clearing house, recognized clearing house, authorized benchmark administrator or exempt benchmark administrator or to any officers thereof -

(i) while carrying on the activity of dealing in capital markets products or providing information in relation to a designated benchmark;

(ii) relating to a financial instrument, collective investment scheme, registered business trust which is managed and operated by the trustee-manager of the registered business trust, or the affairs of a trustee-manager of a registered business trust, entity or a business trust; or

(iii) relating to the enforcement of the business rules of an approved exchange, a licensed trade repository or an approved clearing house or the listing rules of an approved exchange,

shall be guilty of an offence and shall be liable on conviction to a fine not exceeding S$50,000 or to imprisonment for a term not exceeding 2 years or both, subject to section 333 for corporations.

"**Specified capital markets products**" means the products prescribed by regulation 5 of the Securities and Futures (Short Selling) Regulations 2018, namely:

(a) any share of a corporation that is listed on an approved exchange;
(b) any unit in a business trust that is listed on an approved exchange;
(c) any unit in a real estate investment trust.

SGX-ST Rule 8.7.1 requires each sell order for Specified Capital Markets Products to be marked as a Short Sell Order or a normal sell order, and requires the quantity, volume or value of the product to be short sold to be indicated. Under Rule 8.7.2, a Trading Member and its Trading Representative must not enter the sell order in the Trading System if the customer has not indicated the order type and/or has not provided the required quantity, volume or value information for a Short Sell Order.

Where a sell order is partly short, you must split it into two separate orders: a normal sell order for the portion in which you have the requisite interest and a Short Sell Order for the remaining portion.

Interest in Specified Capital Markets Products

Pursuant to Section 137ZH of the SFA, subject to section 137ZH(3), a person has an interest in specified capital markets products if:

(a) the person is the legal or beneficial owner of the specified capital markets products, or has authority (whether formal or informal, or express or implied) to dispose of them;

(b) he:

i) has purchased or has entered into an unconditional agreement or arrangement to purchase the specified capital markets product, but has not yet received delivery of such specified capital markets product;

ii) has tendered other specified capital markets products for conversion or exchange or has issued irrevocable instructions to convert or exchange other specified capital markets products into the specified capital markets product, but has not yet received delivery of such specified capital markets product;

iii) the person has exercised an option to subscribe for the specified capital markets products, but has not yet received delivery; or

iv) the person has exercised a right under a warrant to subscribe for the specified capital markets products, but has not yet received delivery; and

v) under the relevant agreement, arrangement, conversion, exchange, option or right, the person is to receive delivery before the time at which the person is to deliver the specified capital markets products; or

(c) the person is the lender in a securities lending arrangement, has transferred title to the borrower and is to receive title back before the time at which the person is to deliver the specified capital markets products; or the person is party to an agreement or arrangement prescribed for section 137ZH(2)(f). Despite the above, section 137ZH(3) excludes a borrower who obtained title under a securities lending arrangement; a legal or beneficial owner who has sold or entered into an unconditional agreement or arrangement to sell the products; and the specified persons who are parties to arrangements prescribed for section 137ZH(3)(c).

Publication of Report

SGX-ST shall report before the start of each Market Day the aggregate volume of Short Sell Orders matched and executed for the preceding Market Day and in respect of each specified capital markets product for which marking is required.

Reporting of short position

Section 137ZK of the SFA requires, subject to applicable exemptions, short positions in relation to any specified capital markets products that are equivalent to or more than the short position threshold on position day to be reported to the MAS.

The short position threshold is the lower of
(a) 0.2% of total issued shares in the relevant class of shares or units in the relevant class of units of a business trust or real estate investment trust; or (b) S$2,000,000 in aggregate value.

It is the obligation of the person holding the reportable short position to ensure that any relevant short-position is reported to the MAS via the Short Position Reporting System[1] accessed through the MAS website within two business days after position day, being the last trading day of each week.

Reporting of Erroneously Marked Sell Orders

You must promptly notify us of any erroneously marked sell order that has been executed and provide complete and accurate correction information, so that we can submit the report through the facility provided by SGX-ST in accordance with Rule 8.9 and SGX-ST's applicable submission requirements and deadlines.

Please visit the SGX-ST Regulatory Notice 8.7 and 8.9 on marking sell orders and the MAS Short Position Reporting System reporting requirements at https://sprs.mas.gov.sg/Public/FAQ_02.aspx for more information on Short Selling.

- End -

Securities Dealing Services: Singapore Market Annex

[1] https://eservices.mas.gov.sg/sprs

Part A: Risk Disclosure Statement (Rule 4.16.1 of the SGX-ST Rules)

Introduction

The objective of this Risk Disclosure Statement is to provide information concerning the types of trading and investments which can involve special risks in order for you to make an informed assessment of the risks and uncertainties associated with investing or trading in securities, derivatives and structured products before you undertake such transactions through your broker. The associated risk of loss in entering into such transactions can be substantial.

This Risk Disclosure Statement cannot be and is not sufficient to explain all the risks and other significant aspects of entering into the various types of transactions discussed in this document. You should therefore fully understand the nature of the transactions and contractual relationships, the extent of your exposure to risk and the potential losses that can be incurred and, as appropriate, consult your financial and tax advisers or other professional advisers before entering into such transactions. In particular, derivatives transactions and structured products are not suitable for many members of the public. You should carefully consider whether such transactions are suitable for you in light of your financial resources, experience, objectives for engaging in the transactions, ability to bear risks and other relevant circumstances.

Section A of this Risk Disclosure Statement sets out some general investment risks relating to most transactions generally. Section B explains the risks surrounding warrants and investments in emerging markets.

Please read through this Risk Disclosure Statement carefully and consult your broker if you have any questions.

Section A – General Investment Risks

There are various risks of a general nature associated with investing and transacting in securities, derivatives and structured products. These include but are not limited to the following.

Potential losses

You may sustain substantial losses on the transactions if market conditions move against your positions. It is in your interest to understand fully the impact of market movements, in particular the extent of profit or loss you would be exposed to when there is an upward or downward movement in the relevant rates. Your position on various transactions may be liquidated at a loss and you will then be liable for any resulting deficit in your account with your broker. Under certain circumstances, it may be difficult to liquidate an existing position, assess the value, determine a fair price or assess your exposure to risk.

Risk of securities trading

The prices of securities can and do fluctuate, sometimes dramatically, and may become valueless. It is as likely that losses will be incurred rather than profit made as a result of buying and selling securities. In addition, securities regulations and investor protection rules vary with different exchanges. Some may expose investors

in securities listed on those exchanges to high investment risk. In particular, certain exchanges allow companies to list with neither a track record of profitability nor any obligation to forecast future profitability. Such securities may be very volatile and illiquid and their greater risk profiles mean that trading on such exchanges or in such securities may be more suited to professional or sophisticated investors. You should seek independent professional advice if you are uncertain of or have not understood any aspect of the nature of the exchange or the risks involved in trading such securities.

In the case of shares of smaller companies (sometimes known as "penny shares"), there may be a greater risk of loss because there may proportionately be a large difference between the buying price and the selling price of these shares. If they have to be sold immediately, you may get back much less than the amount that you paid for them.

Liquidation of positions

Under certain market conditions you may find it difficult or impossible to liquidate a position. This may arise from the rules in certain markets (for example, the rules of a particular exchange may provide for "circuit breakers" where trading is suspended or restricted at times of rapid price movements).

Placing contingent orders, such as "stop-loss" or "stop-limit" orders, will not necessarily limit your losses to the intended amounts, as it may be difficult or impossible to execute such orders without incurring substantial losses under certain market conditions. Strategies using combinations of positions, such as "spread" or "straddle" positions may be as risky as taking simple "long" or "short" positions.

Securities borrowing

When you borrow securities, you should be aware that failure to return the borrowed securities to your broker on your broker's demand could lead to your broker effecting a buy in without further consultation with you, and you may then be liable for the total costs and expenses incurred by your broker arising from such buy in.

Pricing relationships

The normal pricing relationships between a derivative and its underlying assets may not exist in certain circumstances. The absence of an underlying reference price may make it difficult to assess the "fair" value of a derivative position. Under certain circumstances, the specifications of outstanding contracts (including the exercise price of an option or a warrant) may be modified by an exchange or clearing house to reflect changes in the underlying asset.

Tax risks

Before entering into any transaction you should understand the tax implications of doing so, e.g. income tax. Different transactions may have different tax implications. The tax implications are dependent upon the nature of your business activities and the transactions in question. You should therefore consult your tax adviser to understand the relevant tax considerations.

Currency risks

The profit and loss in transactions in foreign currency-denominated contracts (whether they are traded in your own or another jurisdiction) will be affected by fluctuations in currency rates and the difference between the buying price and the selling price of a currency where there is a need to convert from the currency denomination of the contract to another currency.

Counterparty risks

All transactions that are executed upon your instructions with counterparties and brokers are dependent on their due performance of their obligations. The insolvency or default of such counterparties and brokers may lead to positions being liquidated or closed out without your consent.

Commission and other charges

Your net returns from a transaction would also be affected by the transaction costs (i.e. commission, fees and other charges) charged by your broker, the clearing house and the securities exchange. These costs must be considered in any risk assessment made by you.

Custodial Services

You acknowledge that there may be risks in leaving securities and assets in your broker's safekeeping. Such risks could involve the loss of all your securities and assets, leading to diminished investor protection. You should be prepared to assume these risks if you decide to leave your securities and assets in your broker's safekeeping. You should also understand that in relation to securities and assets held in other jurisdictions, your broker may appoint foreign custodians to safekeep your foreign securities and assets. In this respect, there may be additional risks in relation to such foreign custodians arising from the operation of foreign law, rules and regulations. You should therefore be prepared to assume these further risks before you engage your broker to provide such foreign custodial services. You should also be aware that you may incur additional costs for utilising custodial services. While every attempt will be made to segregate your securities and your broker's securities held with custodians, there may be instances when some custodians may not recognise such segregation. Consequently, your ability to withdraw these securities may be affected if your broker defaults.

Transactions in foreign jurisdictions

Transactions on markets in other jurisdictions, including markets formally linked to a domestic market, may involve additional risk. In particular, securities that are foreign listed securities and are held outside Singapore are subject to the applicable laws and regulations of the relevant overseas jurisdiction that may be different from the Securities and Futures Act 2001 and the rules made thereunder in Singapore. Consequently, such securities may not enjoy the same protection as that conferred on securities received or held in Singapore. Before you trade you should enquire about any rules relevant to your particular transactions. The MAS will be unable to compel the enforcement of the rules of foreign regulatory authorities or markets in other jurisdictions where the transactions have been effected. You should understand the types of redress available in both your home jurisdiction and other

relevant jurisdictions before you start to trade. There may be restrictions for foreigners, repatriation of capital investments and profits and there may be withholding or additional forms of taxes.

Trading facilities and electronic trading

Most trading facilities are supported by computer-based component systems for the order-routing, execution, matching, registration or clearing of trades. As with all facilities and systems, they are vulnerable to temporary disruption or failure. Your ability to recover certain losses may be subject to limits on liability imposed by the system provider, the market, the clearing house and/or member firms. Such limits may vary. Before you conduct any transactions through such facilities or systems, you should understand the details in this respect. Further, trading on an electronic trading system may differ not only from trading in an open-outcry market but also from trading on other electronic trading systems. If you undertake transactions on an electronic trading system, you will be exposed to risks associated with the system including the failure of hardware and software. The result of any system failure may be that your order is either not executed according to your instructions or not executed at all.

Off-exchange transactions

In some jurisdictions and only in restricted circumstances, firms are permitted to effect off-exchange transactions. In addition to the issues concerning the liquidation of positions and pricing relationships generally set out above, offexchange transactions may be less regulated or subject to a separate regulatory regime. Because prices and characteristics of over-the-counter financial instruments are often individually negotiated, there may be no central source for obtaining prices and there can be inefficiencies in the pricing of such instruments. Off-exchange transactions may also involve greater risk than dealing in exchange traded products because there is no exchange market through which to liquidate your position, to assess the value of the product or the exposure to risk. Bid and offer prices need not be quoted, and even where they are, they will be established by dealers in these products and consequently, it may be difficult to establish what a fair price is. Before you undertake such transactions, you should familiarise yourself with applicable rules and attendant risks.

Terms and conditions

It is important that you fully understand the terms and conditions of any transactions that you propose to undertake, including the contractual specifications of any exchange-traded option or contract, the circumstances under which you may become obliged to make or take delivery of an underlying asset upon settlement of a derivatives transaction, and the commissions, fees and other charges for which you will be liable.

You should therefore familiarise yourself with any agreement or confirmation that you may enter into with your broker. You must fully understand your rights and obligations under that agreement or confirmation, and carefully study the trading mechanism and understand the potential risks involved before you trade. You should not sign any agreement or confirmation unless you are familiar with the contents or effects or your professional advisers have explained the contents and effects. In particular, you should be aware that your contract with your broker may

not include the provision by your broker of financial advisory or fund management services. In these cases, you should seek independent advice as to whether any recommendation by your broker is suitable for you in view of your specific investment objectives, financial situation and particular needs.

Section B – Transactions involving special risks

Warrants

What are warrants?

A warrant is a right to subscribe for securities, and is exercisable against the original issuer of the securities. As in the case of options, warrants often involve a high degree of gearing, so that a relatively small movement in the price of the underlying security results in a disproportionately large movement in the price of the warrant. The prices of warrants can therefore be very volatile and may fall in value as rapidly as it may rise due to, including but not limited to, variations in the frequency and magnitude of the changes in the price of the underlying security, the time remaining to expiry and the creditworthiness of the issuer.

A "covered warrant" refers to a right to acquire securities which is exercisable against someone other than the original issuer of the securities.

Risks of trading in warrants

As in the case of options, the buyer of a warrant is subject to the risk of losing the premium and transaction costs. Investments in warrants involve substantial risks including market risk, liquidity risk and the risk that the issuer will be unable to satisfy its obligations under the warrants. You should not buy a warrant unless you are prepared to sustain a total loss of the money you have invested plus the commission or other transaction costs.

An investment in warrants involves valuation risks in relation to the underlying asset, which may vary over time and may increase or decrease by reference to various factors, which may include corporate actions (where the underlying asset is a share or a basket of shares), changes in computation or composition (where the underlying asset is an index), macro economic factors and market trends. Although the issuer may be required or permitted to adjust or amend the conditions of the warrants under certain circumstances, if an event occurs which does not require the issuer to make such adjustments, the price of the warrants and the return upon the exercise of the warrants may be affected.

In the case of exchange-traded warrants, it is not possible to predict the price at which the warrants will trade in the secondary market or whether such market will be liquid or illiquid. To the extent that warrants of a particular issue are exercised, the number of warrants of such issue outstanding will decrease, resulting in a diminished liquidity for the remaining warrants of such issue. A decrease in the liquidity of an issue of warrants may in turn cause an increase in the volatility associated with the price of such issue of warrants. To the extent that an issue of warrants becomes illiquid, the buyer may have to exercise such warrant to realise value. In respect of European-style warrants, as they are only exercisable on the expiration date, you will not be able to exercise your warrants to realise value in the event that the relevant issue becomes illiquid.

Investments in emerging markets

What are the emerging markets?

Emerging markets are the markets for securities trading in countries that possess one or more of the following characteristics:

- A certain degree of political instability
- Relatively unpredictable financial markets and economic growth patterns
- A financial market that is still at the development stage
- A weak economy

The risks described below should be assessed by reference to the relevant market, issuer and investment.

Risks to be borne in mind

There are risks linked to investments in emerging markets that are not encountered in their more established counterparts. This is also the case when the issuer or provider of a product has its headquarters or primary focus of activity in an emerging nation. Such risks include (without limitation) sovereign risk, issuer risk, price risk and liquidity risk. Investing in the products of such issuers or providers is therefore often speculative.

Although investments in emerging markets related instruments can yield high gains, they can also be highly risky as the markets are unpredictable and there may be inadequate regulation and safeguards available to investors. Before investing in emerging markets, you should form an impression of them that allows you to assess the risks involved.

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