

SURVEILLANCE TO DETECT AND PREVENT SUSPICIOUS TRANSACTIONS

In order to maintain a fair-trade environment, and to prevent market manipulation and insider trading, the trade surveillance team monitors real time market prices and transactions as well as conducts detailed analysis after market close.

During market hours, our surveillance team may ask trading participants for transaction details, end-client information, and other intelligence needed for the detailed analysis of trades. When a trade is considered as unfair after the investigation, the our surveillance team notifies trading participants to draw attention to the identified issues. If improvements are not shown after the notification, our surveillance team may consider conducting some limitations or suspension of trade of that participants.

Furthermore, our surveillance team may provide detailed information of those suspicious transactions to institutions such as SESC (Securities and Exchange Surveillance Commission) and self-regulatory organizations.