

(*Translation)

Business Continuity Plan ("BCP")

December 18, 2025
Tokyo Financial Exchange Inc.

Tokyo Financial Exchange Inc. ("TFX") has been committed to maintaining a system for its business continuity in case of emergency. As part of such efforts, written action plans have been made available to the public: "Contingency Plan for System Failure and Other Emergencies" which defines action plan for its stable and continued business operations in the case of system failure or other emergencies ("Contingency Plan"), as well as this BCP.

To maintain the system even when business continuity is expected to be difficult due to major earthquakes and terrorisms, etc., the BCP sets out policy and recovery procedures in the case of risk events causing suspension of TFX's operations. TFX discloses the BCP to the public to the extent it does not affect the security.

The BCP will be reviewed and updated once every year.

1. Basic policy about BCP

The BCP is designed to clarify the TFX's basic policy for ensuring its business continuity on a company wide basis.

In case of any risk exposure, the TFX will endeavor to continue the business operation as far as possible, and minimize the impact on the Trading Members and institutions and organizations concerned.

Should TFX be compelled to suspend trading, a quick and effective recovery will be sought.

2. Scope

(1) Assumed risks

The following risks are assumed to cause suspension of TFX's operation:

- Natural disaster (including earthquakes, damage by wind and floods, epidemics)
- Breakdown of social infrastructures (including electricity and telecommunications systems)
- Cyber-terrorism (including virus attack, data tampering, unauthorized access)
- Terrorism (including destructive acts and threats by pre-notice)
- System failure (hardware and software)
- Other disasters (including fires)

(2) Scope of application

The BCP is applied to the TFX's officers and employees, personnel of system developers and system operation contractors, and system facilities.

In addition, TFX will endeavor to obtain understandings of BCP from the Trading Members, information vendors and other institutions and organizations concerned, to ensure a close cooperation with them in case of emergency.

3. Actions

Each occurrence of emergency is classified to, either events resulting from “large-scale disaster” or “system failure”, depending on its nature, as described below:

(1) Events resulting from large-scale disaster

TFX will take the following steps in response to events resulting from large-scale disaster such as major earthquake, and terrorism, etc.:

- (i) Gathering information, and understanding the situation (including establishment of communication system, securing contacts with Trading Members, information vendors and external institutions and organizations concerned),
- (ii) Setting up an emergency headquarters,
- (iii) Determining the action plan,
- (iv) Implementing the action plan either solely or in combined implementation depending on the severity of the damage incurred by TFX facility:
 - (a) In the event of TFX office being unavailable; transferring the business operations to a backup office,
 - (b) In the event of main center being unavailable for various trading and clearing system managed by TFX (“Exchange System”); switching to a disaster recovery site (“DR Site”),
 - (c) In the event of Exchange System and/or other settlement-related system being unavailable, resulting from serious failure of hardware, software, etc. (even if main center is available); recovering system, etc. in accordance with “Contingency Plan”.

(2) Events resulting from system failure

In the event of Exchange System being unavailable, resulting from failure of hardware, software, etc. (except for large-scale disaster), TFX will follow the system recovery steps in accordance with Contingency Plan.

4. Target time for recovery

If Exchange System becomes unavailable (either in the events resulting from large-scale disaster or system failure), TFX will endeavor to establish a state in which recovery is possible within a defined time frame as follows:

- (i) for the business relevant to market trading: within 24 hours
- (ii) for the critical information systems: within 2 hours

In addition, TFX will also endeavor to complete scheduled settlement on such day by the end of the day.

5. BCP operation system

The following system and infrastructures are maintained in order to implement the BCP in case of disaster.

(1) Securing necessary Manpower

In case of disaster, safety of the TFX’s officers and employees shall be confirmed promptly by means of “safety confirmation system” introduced to secure necessary manpower.

(2) Ensuring of telecommunications tools

In order to secure communications in case of disaster, TFX sets in place a variety of telecommunications means, including but not limited to, telephone, facsimile, priority telephone for times of disaster, mobile phone and e-mail. Further, TFX regularly updates contact lists with the Trading Members, information vendors, and external institutions and organizations concerned.

(3) Backup office

TFX has backup office, in which it will continue the business operations in case that its offices have become unavailable.

(4) Data center

TFX's core system is located in a robust data center, which not only fully meets the system standards prescribed by The Center for Financial Industry Information Systems (FISC) (so-called "FISC Security Guidelines on Computer Systems for Financial Institutions") but also has obtained a validation of ISO27001 certification system (information security management system).

Further, in case that a disaster has occurred and the main center for Exchange System has become unavailable, TFX will switch the operation to DR Site. In addition, TFX has an external backup for necessary data to secure continued operation in case of disaster.

(5) Manuals

TFX regularly updates manuals (including manuals for holding action plan meetings) to quickly respond to a disaster.

(6) BCP operation test and training

TFX conducts switching drill to a backup office and to the DR Site as well as training programs for its officers and employees at least once every year, so that in case of disaster, it will be able to act decisively and swiftly, taking the necessary steps.

6. Revision and Abolition

The revision or abolition of this BCP shall be subject to a resolution of the Board of Directors. However, minor modifications of a non-substantive nature may be executed with the approval of the President & CEO.

* Disclaimer: This English version is not an officially accurate translation of the original Japanese BCP. In the case where any differences may occur in the English version, the original Japanese BCP will prevail. Tokyo Financial Exchange, Inc. (TFX) shall not accept any responsibility for damage or loss caused by any errors, inaccuracies, misunderstandings or misspelling with regard to the translation of the BCP. This translation may be used only for reference purposes. TFX maintains the right to claim compensation from violators for any damages loss it may suffer from the violation of these conditions.