

United States of	Electronic trading. Starting March 23, 2020, the New York Stock	
A	Electronic trading training training 1.	NYSE To Temporarily Close Floor, Move To Electronic
America	Exchange will temporarily close its trading floor and move fully to	Trading After Positive Coronavirus Tests
	electronic trading. The facilities to be closed are the NYSE equities	Choe Options Exchange Temporarily Shift to Fully
	trading floor and NYSE American Options trading floor in New York,	Electronic Trading
	and the NYSE Arca Options trading floor in San Francisco. The CME	
	Group temporarily closed its Chicago trading floor as of the close of	
	business on March 13, 2020. Cboe temporarily moved to electronic	
	trading effective on March 16, 2020.	
Austria	 Restrictions on short selling. The Austrian Financial Market Authority 	Austria's Financial Markets Watchdog Bans Short-Selling
	(FMA) temporarily prohibited the short selling of certain financial	<u>Until April 18</u>
	instruments on the Vienna stock exchange until April 18, 2020. The	
	ban includes creating or increasing net short positions via derivatives	
	or other financial instruments which confer a financial advantage in	
	the event of a decrease in the price of covered stocks. Short sales of	
	equity indices or baskets are covered by the ban if the restricted	
<u> </u>	securities account for 50% or more of their composition.	
Australia	Restrictions on trading. Australian Securities & Investments	Australian Securities & Investments Commission Media Release
	Commission (ASIC) has issued directions under the ASIC Market	
	Integrity Rules to a number of large equity market participants, requiring	
	those participants to limit the number of trades executed each day until	
	further notice. These directions require those firms to reduce their number of executed trades by up to 25% from the levels executed	
	on Friday.	
Belgium	Restrictions on short selling. The Belgian regulator, the Financial	Short-Selling Bans Sweep Europe in the Hope of Stemming
Deigium	Services and Markets Authority (FSMA), announced a ban on shorts for	Stock Market Bleeding
	a basket of stocks during Tuesday's (March 17, 2020) trade in order to	Spain, Italy, Belgium and France Issue Short-Selling Bans
	avoid what it termed a "disorderly decline" in markets. The ban applies	Financial Services and Markets Authority - Prohibition of Short
	until April 17, 2020.	Selling
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Colombia	Contingency measures. Direccion de Impuestos y Aduanas Nacionales	The Colombian Securities Exchange Enables Connection of
	(DIAN), the Colombian tax authority, has activated contingency	Market Traders from Their Homes
	measures due to the Covid-19 crisis allowing market traders to work	
	from their homes. As a result, there may be delays in account opening,	
	name change, and account closing requests while the contingency	
	measures are in effect.	
re 1 of 5		OStradley Ropon Stevens & Voung IIP

Country	Restrictions	Source Information
European Union	Restrictions on short selling. The European Securities and Markets Authority (ESMA), on Tuesday, March 17, 2020 began forcing greater transparency of short positions by halving the threshold at which they must be disclosed. The revised rules are expected to be in place for a duration of three months.	Short-Selling Bans Sweep Europe in the Hope of Stemming Stock Market Bleeding ESMA Decision (March 16, 2020)
France	 Restrictions on short selling. France's Autorité des Marchés Financiers (AMF) banned short selling in 92 shares, those most impacted during Monday's (March 16, 2020) sell-off, until the end of Tuesday's (March 17, 20202) trading session. The AMF expanded that ban to cover all shares admitted to trading on French trading venues until the close of business on April 16, 2020. The ban prohibits creation or increase of net-short positions, meaning that all forms of shorting, including through derivatives and depositary receipts are covered. 	Short-Selling Bans Sweep Europe in the Hope of Stemming Stock Market Bleeding Spain, Italy, Belgium and France Issue Short-Selling Bans Autorité Des Marchés Financiers - Decision of 17 March 2020 Regarding the Extension of the Ban of Net Short Positions
Greece	• Restrictions on short selling. The ban covers shares admitted to trading on the Athens Stock Exchange until April 24, 2020. It prohibits creation or increase of net-short positions (including on an intra-day basis). Short-selling transactions via derivatives, depositary receipts and indices are covered by the ban.	Athens Stock Exchange Press Releases
India	 Restrictions on short selling. Sebi announced restrictions on March 20, 2020 that halved position limits for certain stock futures, restricted short selling of index derivatives and raised margin rates for some shares in a bid to curb "abnormally high" volatility. The restrictions come in effect on March 23, 2020, and will continue for one month. The Reserve Bank of India cut trading hours for certain markets, including bonds and foreign currency to four hours from April 7, 2020 to April 17, 2020. 	NSE Circulars - March 20, 2020 (Futures & Options Circular 43967) RBI Notifies Changes in Market Hours
Indonesia	Trading safeguards. The Indonesia Stock Exchange tightened its trading halt mechanisms to trigger a cessation of the main stock index more quickly effective March 11, 2020. Additionally, on March 26, 2020, the Indonesia Stock Exchange reduced its trading hours.	IDX Implements Provisions Regarding Trading Halt for Trading in the Exchange Changes in Trading Hours on the Stock Exchange and Settlement Operational Hours Adjustment

Country	Restrictions	Source Information
Italy	 Restrictions on short selling. Financial market authority Consob has prohibited short sales on 20 stocks for the trading session of March 17, 2020. Consob expanded the ban to cover a larger number of stocks and to continue until June 18, 2020, though restrictions could be lifted earlier according to market conditions. The ban prohibits creation or increase of net-short positions, including through derivatives and depositary receipts, except: (i) delta-neutral positions used to cover a long position in a convertible bond; or (ii) positions used to cover long positions in subscription rights. Net-short positions held through indices are covered if the restricted securities represent more than 20% of the index. 	Short-Selling Bans Sweep Europe in the Hope of Stemming Stock Market Bleeding Spain, Italy, Belgium and France Issue Short-Selling Bans Consob - Resolution no. 21303 Frequently Asked Question on the Temporary Ban on Net Short Positions (Updated as of March 19, 2020)
Jordan	 Market closure. Jordan's government suspended trading in the Amman Stock Exchange from Tuesday, March 17, 2020 until further notice. 	Jordan Suspends Trading in Amman Bourse Over <u>Coronavirus</u>
Kuwait	 Market closure. Trading closed on March 12, 2020 and resumed on March 15, 2020 to address the fast-paced changes and turbulence facing the local exchange market, as well as regional and international exchanges, as a result of the Covid-19 outbreak. Trading safeguards. The transfer of ownership, mandatory execution, off market trade, and over the counter (OTC) trading will all be postponed for a week. Boursa Kuwait also announced the reduction of price limits and security circuit breaker (CB) triggers, applying a 10% upper limit and CB trigger, and -5% lower limit and CB trigger. 	Kuwait Stock Exchange to Resume Trading on March 15 with Reduced Loss Limit Kuwait Stock Exchange Says It Suspends Operations on March 12
Malaysia	 Restrictions on short selling. The Securities Commission Malaysia and the Bursa Malaysia Berhad announced March 23, 2020, that short selling will be temporarily suspended until April 30, 2020. 	SC and Bursa Suspend Short Selling Amid Covid-19 Volatility
Philippines	 Market closure. Philippine Stock Exchange closed Tuesday, March 17, 2020. Trading resumed on Thursday, March 19, 2020 with shortened trading hours. Trading of foreign exchange and bonds resumed on Wednesday, March 18, 2020. Trading safeguards. On March 21, 2020, the Philippine Stock Exchange announced that starting March 24, 2020, the lower static threshold of individual stock prices will be reduced from 50% to 30% from its previous closing price. 	Yahoo Finance - Philippines Becomes First Country to Shut Financial Markets Thanks to Virus Philippine Stock Exchange Memorandum Dated March 17, 2020 Philippine Peso Rises as Trading Resumes; Stocks to Reopen PSE Reduces Lower Static Threshold of Share Prices

Country	Restrictions	Source Information
South Africa	Restrictions on short selling and trading safeguards. The Johannesburg Stock Exchange ("JSE") decided against shortening trading hours, but its head said JSE would strictly enforce rules prohibiting uncovered, or naked short-selling and lengthen the mandatory halts to trading circuit breakers.	Prohibition in JSE Rules on Naked Short Selling JSE Ensures Continued Trading Amid Covid-19
South Korea	 Restrictions on short selling. South Korea's financial regulator banned short selling in listed shares on the Kospi and Kosdaq starting on March 16, 2020 for six months. 	Financial Services Commission Press Release (March 13, 2020)
Spain	Restrictions on short selling. Comisión Nacional del Mercado de Valores (CNMV) has forbidden market players to build new net short positions in all Spanish shares or to increase existing ones for one month, effective March 17, 2020. This ban can be renewed for three-months periods if necessary. In addition to Spanish stocks, the ban also applies to index-linked products, spots, derivatives as well as over-the-counter transactions.	Short-Selling Bans Sweep Europe in the Hope of Stemming Stock Market Bleeding Spain, Italy, Belgium and France Issue Short-Selling Bans
Sri Lanka	 Market closure. Colombo Stock Exchange closed Tuesday, March 17, 2020 and remained closed through March 19, 2020. The Government declared a holiday asking all non-essential businesses not to operate on March 17-19, 2020. Trading resumed on March 20, 2020, but then was suspended again at noon local time the same day in view of the curfew imposed by the government to allow staff to travel to their homes. On March 22, 2020, the Colombo Stock Exchange announced that the market would be closed on March 23 and 24, 2020, as those days have been declared market holidays. The market until curfew in the country has been lifted. 	Sri Lanka Stock Market Closed Tuesday in Coronavirus Holiday Sri Lanka Follows Suit After the Philippines Suspends Trading Colombo Stock Exchange Circulars Announcing Closures
Taiwan	 Restrictions on short selling. The Financial Supervisory Commission announced a short selling ban on the Taiwan Stock Exchange and the Taipei Exchange starting March 20, 2020. The ban applies to stocks that showed a decline of 3.5% or more a day earlier. 	FSC Bans Short Selling to Curb Losses
Thailand	Restrictions on short selling and trading safeguards. The Stock Exchange of Thailand ("SET") restricted short selling to trade only the price higher than the last trading price (uptick) effective since the afternoon trading session of March 13, 2020. Additionally, the SET announced further tightening of trading measures by adjusting ceiling and floor criteria and	

Country	Restrictions	Source Information
	circuit breaker rules, effective from March 18, 2020, which are set to	
	extend no further than June 30, 2020.	
Turkey	Restrictions on short selling and trading safeguards. Restrictions on short	Announcement on Measures with Respect to Capital
	selling were initially imposed in February 2020 following an airstrike. As a	Markets in Response to the Covid-19 Outbreak
	result of current market conditions, the bans on short selling will be kept	
	in force until further notice. Additionally, circuit breakers were tightened	
	effective March 13, 2020 in the equities and derivatives market.	
United Arab	Trading safeguards. Effective March 18, 2020 until further notice, a limit	Trading Safeguards - Modification to Section 2.13 Nasdaq
Emirates	of 5% will apply to all securities trading on Nasdaq Dubai markets.	<u>Dubai Trading Manual - Equities</u>
United Kingdom	 Restrictions on short selling. The U.K.'s Financial Conduct Authority 	Short-Selling Bans Sweep Europe in the Hope of Stemming
	(FCA) also issued a temporary ban on the shorting of 37 Belgian and	Stock Market Bleeding
	Italian stocks following moves from respective regulators in both	London Stock Exchange: Temporary Prohibition of Short
	countries. The ban was effective March 17, 2020 until the end of the day	Selling
	March 17, 2020.	