

Best Execution Policy

NAB Japan Securities Limited

Enacted on June 28, 2019

This Best Execution Policy, set forth in accordance with Article 40-2(i) of the Financial Instruments and Exchange Act, defines our policy and methods to execute client orders on the best conditions for clients.

When we accept client order for securities listed on a financial instruments exchange in Japan, and when there is no specific instruction from client regarding execution, we endeavour to execute the order in accordance with this Policy described in the below.

1. Securities covered in this Policy

This Policy applies to the "listed share certificates, etc." prescribed under Article 16-6 of the Financial Instruments and Exchange Act Enforcement Order, including stocks, corporate bonds with warrant, ETFs (beneficiary certificates in investment trusts linked to a stock index), and REITs (Real Estate Investment Trusts) which are listed on a financial instruments exchange in Japan. Stocks and corporate bonds with warrant, including but not limited to "Tradable Securities" defined in Article 67-18, Item 4 of the Financial Instruments and Exchange Act are outside the scope of this Policy.

2. Methods of Best Execution

With respect to all client orders on listed stocks, etc. we will prioritize the means of cross trade where the Company acts as the counterparty to the client or cross trade where the Company acts as an intermediary for our affiliated company who becomes the counterparty.

3. Reasons to select Execution Method

When we decide to execute orders from clients through cross trade with us or our overseas affiliate at a reasonable price we decide considering the market price, the basis for such decision is that the execution is more secure and the trading cost is lower in the said cross trade compared with the execution on a financial instruments exchange.

4. Others

- (1) Regardless of the methods explained in 2. above, we execute the following types of trades as is described below:
 - i) Orders for which client has specified the execution method (e.g. requesting us to act as the direct counterparty, etc.):
 - The method instructed by client
 - ii) Orders for which the execution method is specified in the General Terms or the like.
 - The designated execution method

- (2) As a result of system error, etc., we may have to choose a method other than what we normally choose based on this Best Execution Policy in some cases. In such cases though, we will still endeavour to execute orders on the best terms possible.

The duty of Best Execution not only relates to price but also involves comprehensive consideration of various factors such as cost, speed and certainty of execution. Therefore, even if an execution price is found not being the best possible price then after a trade takes place, that alone is not necessarily regarded as a violation of the duty of Best Execution.