Fixed Income 2 July 2020

Japanese report: 30 June 2020



Daiwa's View

Japan

YCC observations series (2): History and implications of American YCC in the 1940s

➤ (1) Consistency with future policy interest rates and inflation expectations, (2) dilemma presented by government debt management policy and price stability targets, and (3) stability of financial system when exiting YCC

Fixed Income Research Section FICC Research Dept.

Economist **Kenji Yamamoto**(81) 3 5555-8784
kenji.yamamoto@daiwa.co.jp



Daiwa Securities Co. Ltd.

(1) Consistency with future policy interest rates and inflation expectations, (2) dilemma presented by government debt management policy and price stability targets, and (3) stability of financial system when exiting YCC

YCC observations series (2): History and implications of American YCC in the 1940s

The yield curve control (YCC) currently adopted by the Bank of Japan (BOJ) is neither the only case nor even the first case of a central bank implementing an interest rate peg / cap policy. The US introduced the so-called YCC policy of pegging the short-term interest rate and setting a cap on the long-term interest rate for nine years from the beginning of 1942 to 1951, a period that included World War II.

The Fed reviewed this US version of YCC in June 20031. Here, we will confirm the history and implications of the US version of YCC, focusing on the Fed's analysis and also referring to several other papers.

♦ Summary

During the nine years from the beginning of 1942 until 1951 when an accord was signed between the Fed and Treasury Department, the US adopted a YCC policy of pegging the short-term interest rate and setting a cap on the long-term interest rate (25-year bonds). The policy was started for the purpose of supporting the issuance of government bonds by the Treasury Department during the war. During the first half of this period, which took place during wartime, confidence in the interest rate cap was maintained and long-term interest rates remained stable. However, as inflation began to become a problem in 1947, the interest rate cap fell under pressure and the Fed's balance sheet structure changed significantly. The Fed eventually abandoned the peg system after an agreement (accord) was reached with the Treasury Department during a dilemma presented by debt management policy and rising inflation following the start of the Korean War.

As it turns out, market trust in the peg system depends heavily on inflation expectations and future policy interest rate expectations. In other words, if inconsistencies become apparent between expectations for future policy interest rates and target interest rates, the cost of sustaining that framework surfaces in the form of expansion of the balance sheet. Also, the yield curve depends largely not only on the central bank but also on the government's debt management policy. In particular, if the central bank is factored into the debt management policy, there is always the possibility of a dilemma regarding price stability targets. When exiting from YCC, there is a risk of causing conflicts with the fiscal authorities and the emergence of problems related to the stability of the financial system in which capital losses are sustained by government bond holders with the rise in long-term interest rates.

¹ Chaurushiya, Radha, and Ken Kuttner (2003). "Targeting the Yield Curve: The Experience of the Federal Reserve, 1942-51," which was released in April 2016.



♦ History leading up to YCC

The policy adopted by the Fed was initiated not to support monetary policy purposes, but to support the issuance of government bonds by the Treasury Department during the war. However, involvement in the government bond market by the Fed had already begun before the war. In 1935, in response to a request from the Treasury Department that feared rising interest rates, the Fed purchased long-term Treasury bonds for the first time. Also, in 1939, as pressure on rising interest rates increased with the outbreak of the war in Europe, additional purchases were made for the purpose of "maintaining orderly conditions in the market for United States Government securities."

However, because the US entered World War II due to the December 1941 attack on Pearl Harbor, a budget deficit and inflation were expected to ensue, and Treasury bond prices fell. Therefore, as a result of discussions and compromises between the Treasury Department and the Fed in March 1942, it was agreed to set a cap of 2.5% for the long-term interest rate (25-year bond), 2% for the 7-9 year interest rates, and 0.875% for the 1-year interest rate. Regarding the corresponding short-term interest rate, the Fed agreed to maintain (peg) the T-bill rate at 0.375%.

It is important to note here that only short-term rates were pegged and long-term rates were capped. And, the agreement on the long-term interest rate cap was not initially announced. This was "perhaps to avoid embarrassment in case the policy proved unsuccessful."

Market Yields on Short-term Securities 2.5 Mar. 1942 July 1947 Mar. 1951 Beginning of Pattern of Rates End of 0.375% Bill Peg 2.0 1.5 9- to 12-month 1.0 Treasury Certificate Prime CP Banker's Acceptance 0.5 3-month US Treasury Bill 0.0 1944 1942 1943 1945 1951 1952

Chart: Market Yields on Short-term Securities

Source: Extract from Fed (2003). "Targeting the Yield Curve: The Experience of the Federal Reserve, 1942-51."

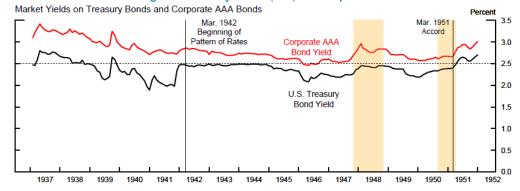
◆ First half of the YCC period (1942-47)

The long-term interest rate rose rapidly from 2% to nearly 2.5% as the US entered the war in the latter half of 1941. However, the Fed did not intervene to protect the cap at this time. During this period, the actions of the Fed and private sector were governed by the short-term interest rate pegged at 0.375%.

During 1942-1943, it was becoming increasingly apparent that the Treasury Department and the Fed had set a cap on the long-term interest rate (2.5%). However, based on market expectations that the policy of pegging short-term interest rates would continue, this level was higher than the theoretical value of the long-term interest rate expected from the term structure of the interest rate (a steep yield curve was not consistent with the market's outlook for short-term interest rates). Low inflation expectations due to experience with deflation during the 1930s and the effects of price control during the war can be pointed out as reasons for these market expectations. Expectations regarding inflation serve as an important factor also in the latter half of this report.



Chart: Market Yields on Long-term Treasury Bonds (25Y) and Corporate Bonds

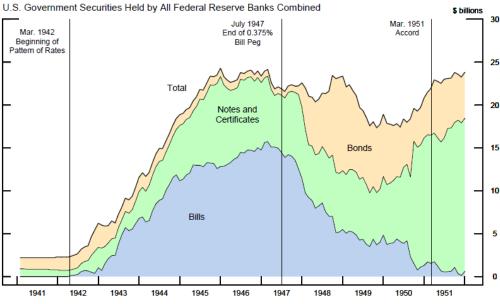


Source: Extract from Fed (2003)."Targeting the Yield Curve: The Experience of the Federal Reserve, 1942-51."

As a result, the private sector shifted its holdings from short-term Treasuries to more undervalued long-term Treasuries. In contrast, the Fed purchased a large number of short-term Treasuries, leading to an increase in the number held. Meanwhile, the holding of long-term government bonds decreased. An important suggestion here is that the 2.5% cap could have been higher than the equilibrium rate of the time without the cap2, as shown by the fact that the Fed did not have to act to protect the cap on the long-term interest rate.

Subsequently, the long-term interest rate followed a downward trend after the spring of 1945, as the war came to an end. After all, "expectations of low future nominal short-term interest rates were the major factor keeping long-term rates low during this period, rather than the caps themselves." However, the situation had changed significantly since then. In 1946, wage and price controls were eased, and prices began to rise sharply as demand for US products surged in Europe.

Chart: Breakdown of Treasury Bonds Held by Fed



Source: Extract from Fed (2003)."Targeting the Yield Curve: The Experience of the Federal Reserve, 1942-51."

- 3 -

² As the fact that the Fed had set an upper limit (cap) on long-term interest rates became known, the downside risk premium embedded in long-term Treasury bond prices declined, and institutional investors such as life insurers bought long-term Treasury bonds to gain profit from the long-term/short-term yield spread. Investors sold T-bills, corresponding to purchases of long-term Treasury bonds. As a result, the Fed conducted opposite operations for such investor transactions.

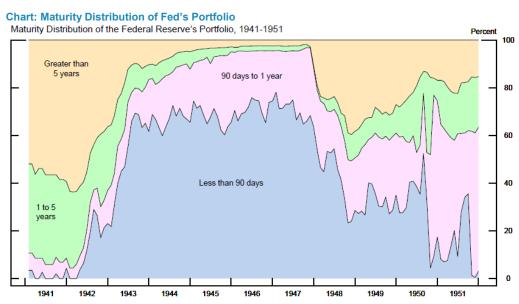


◆ Latter half of the YCC period (1947-51)

Inflation subsided at one point in the first half of 1947, but then rose again in the second half of the year, rising by 12% annually from June to December. As a result, the Fed raised its short-term interest rate target to 0.875% in July 19473 and then to 1.1% in October 1948, based on an agreement with the Treasury Department.

With such a sharp rise in interest rates, the long-term interest rate level of 2.5% was no longer attractive to investors. Also, the abandonment of the short-term interest rate "peg" may have raised doubts about the reliability of the long-term interest rate "cap." As a result, the private-sector portfolio shifted significantly from long-term Treasury bonds to short-term Treasury bonds, putting upward pressure on long-term interest rates.

The Fed showed a stance of protecting the upper end of the long-term interest rate by purchasing a large number of Treasury bonds (incl. those worth \$2bn in Nov and Dec 1947 and \$3bn in 1Q 1948). During this period, the purchases of long-term Treasury bonds were covered by the amount of redemptions of short-term Treasury bonds, and the size of the Fed's balance sheet did not change much. However, in the latter half of 1948, a large proportion of Treasury purchases was covered by expansion of the balance sheet. The proportion of long-term Treasury bonds on the Fed's balance sheet also increased significantly.



Source: Extract from Fed (2003)."Targeting the Yield Curve: The Experience of the Federal Reserve, 1942-51."

Afterwards, a recession started in November 1948 and long-term interest rates declined, but then the recession ended in October 1949. When the Korean War broke out in June 1950, upward pressure on interest rates began to rise again. With the rise in market interest rates, the Fed's purchases of Treasury bonds increased, and the balance sheet started to expand.

The Treasury Department supported a policy of keeping interest rates low to facilitate funding the war. However, purchases of consumer goods began and people's inflation expectations rapidly increased in anticipation of the possible start of a wartime distribution system. As a result, the Fed wanted to raise the short-term interest rate, but the Treasury Department opposed this, leading to deepening conflict between the two.

- 4 -

³ The market already regarded short-term interest rate pegs as unrealistic during this period, and market interest rates for instruments such as CP were on the rise. Starting at this time, the target for short-term interest rates was decided at each meeting with the approval of the Treasury Department.



♦ Accord and bond conversion

In the end, "it became abundantly clear during this period that the interest rate caps were hampering the Federal Reserve's ability to achieve its monetary policy objectives, and in particular its efforts to contain rapidly rising inflationary pressures." In other words, it came to be understood that, during a period of inflation, a dilemma is presented by debt management policy and interest rate adjustments.

As a result, an accord was signed between the Fed and Treasury Department in March 1951, with a statement saying "The Treasury and the Federal Reserve System have reached full accord with respect to debt management and monetary policies to be pursued in furthering their common purpose to assure the successful financing of the Government's requirements and, at the same time, to minimize monetization of the public debt." In April 1951, the 2.5% long-term interest rate cap target was abolished, and then the Fed's Treasury price support policy came to an end (shifting to a "bills only" policy).

That said, the difficulty associated with the abolition of the long-term interest rate cap target was the generation of capital losses by Treasury holders due to the rise in long-term interest rates. There was a problem regarding the maintenance of the stability of the financial system—i.e., the impact on the solvency of banks and life insurers, which were the major Treasury holders at that time. Therefore, the Treasury Department absorbed most of the losses that came with the removal of the interest rate cap by exchanging marketable Treasury bonds for non-marketable Treasury bonds (bond conversion) and reducing the balance of marketable Treasury bonds⁴.

Chart: The 1951 "Accord" in US

-- 1951 Accord --

"The Treasury and the Federal Reserve System have reached full accord with respect to debtmanagement and monetary policies to be pursued in furthering their common purpose to assure the successful financing of the Government's requirements and, at the same time, to minimize monetization of the public debt."

Changes in Monetary Policy after the Accord

	Before Accord	After Accord
Policy Implementation	•Maintain the cap of the bond yield	•Stabilize prices
Involvement in Government Bond Market	Purchase the short-term government bonds at a specific rate Maintain the cap of the long-term bond yield	•Bills Only Policy •Interest rate structure is formed by market forces
Balance Sheet	•Shift from the gold reserve to the government bond holding	•Keep holding mainly the government bonds at the same amount

Source: Extracted from Masayoshi Amamiya (2017) "History and Theories of Yield Curve Control."

◆ Conclusions (implications) drawn from the US version of YCC

From history, we can ascertain that the American experience with YCC during 1942-51, in which the yield curve was managed by using an interest rate cap, can be divided into two general periods. The long-term interest rate cap target for the first five years did not face challenges due to the open-ended short-term interest rate peg and restrained inflation expectations. In short, the interest rate cap target of 2.5% was higher than the equilibrium rate in the absence of the cap, due to low expectations for future short-term interest rates.

However, in the last five years, inconsistencies between the interest rate cap target and the monetary policy target for price stability came to the surface. In other words, when short-term interest rates were hiked in line with the rise in inflation and inflation expectations, the Fed's target for the long-term interest rate cap was often threatened, forcing the Fed to buy long-term Treasury bonds, which significantly changed its balance sheet structure. According to a recent paper by the New York Fed⁵, "large-scale open

- 5 -

⁴ In the framework, marketable long-term Treasury bonds with 2.5% coupons were exchanged for non-marketable Treasury bonds with 2.75% coupons (with a right to convert to 5-year medium-term Treasury notes with 1.5% coupons). Details of the issues related to the exit from YCC, including bond conversion, will be explained in a separate report.

⁵ Kenneth D. Garbade (2020). "Managing the Treasury Yield Curve in the 1940s."



market operations may be required in the course of refixing, from time to time, the shape of the yield curve," which is one lesson from this policy.

In addition, due to the further increase in inflation (expectations) following the outbreak of the Korean War, the cap target was abandoned. As it turns out, market trust in pegs depends heavily on inflation expectations and future policy interest rate expectations. In other words, if inconsistency between expectations regarding future policy interest rates and target interest rates becomes apparent, the cost to sustain that framework surfaces in the form of expansion of the balance sheet.

Moreover, the major factors that brought about inflation and interest rate pressure at the time were the increase in demand due to the war and the increased issuance of Treasury bonds for procuring funds to cover the cost of the war. The Fed's monetary policy was incorporated into debt management policy, similar to how it was originally initiated to support the issuance of government bonds by the Treasury Department during the war. Therefore, there was always the possibility of a dilemma regarding price stability targets.

The yield curve is greatly influenced not only by the central bank, but also by the government's debt management policy. In order for the central bank to carry out YCC, it is necessary to always consider the government's response, and "the shape of the yield curve cannot be fixed independently of the volatility of interest rates and debt management policies" (another lesson stated in the aforementioned paper by the New York Fed).

That said, the major difference between that time and now is that low inflation and low growth (concerns about secular stagnation) have taken root, and there is a strong need for collaboration of fiscal and monetary policies. Policymakers probably need to make use of previous YCC in ongoing policy discussions, while taking account of the differences in preconditions.

In the end, the challenge of YCC lies in the withdrawal strategy. In other words, if the long-term interest rate jumps in the process of abandoning the peg system, banks will incur capital losses, which may threaten the stability of the financial system. This is an important issue when discussing the 'maturity' of government bonds whose yield targets have been set, and it can also be said to be a challenge with regard to Japan's exit from its YCC policy.



Explanatory Document of Unregistered Credit Ratings

In order to ensure the fairness and transparency in the markets, Credit Rating Agencies became subject to the Credit Rating Agencies' registration system based on the Financial Instruments and Exchange Act. In accordance with this Act, in soliciting customers, Financial Instruments Business Operators, etc. shall not use the credit ratings provided by unregistered Credit Rating Agencies without informing customers of the fact that those Credit Rating Agencies are not registered, and shall also inform customers of the significance and limitations of credit ratings, etc.

■ The Significance of Registration

Registered Credit Rating Agencies are subject to the following regulations:

- 1) Duty of good faith.
- 2) Establishment of control systems (fairness of the rating process, and prevention of conflicts of interest, etc.).
- 3) Prohibition of the ratings in cases where Credit Rating Agencies have a close relationship with the issuers of the financial instruments to be rated, etc.
- 4) Duty to disclose information (preparation and publication of rating policies, etc. and public disclosure of explanatory documents).

In addition to the above, Registered Credit Rating Agencies are subject to the supervision of the Financial Services Agency ("FSA"), and as such may be ordered to produce reports, be subject to on-site inspection, and be ordered to improve business operations, whereas unregistered Credit Rating Agencies are free from such regulations and supervision.

■ Credit Rating Agencies

[Standard & Poor's]

The Name of the Credit Rating Agencies group, etc

The name of the Credit Rating Agencies group: S&P Global Ratings ("Standard & Poor's")

The name and registration number of the Registered Credit Rating Agency in the group: S&P Global Ratings Japan Inc. (FSA commissioner (Rating) No.5)

How to acquire information related to an outline of the rating policies and methods adopted by the person who determines Credit Ratings

The information is posted under "Unregistered Rating Information" (http://www.standardandpoors.co.jp/unregistered) in the "Library and Regulations" section on the website of S&P Global Ratings Japan Inc. (http://www.standardandpoors.co.jp)

Assumptions, Significance and Limitations of Credit Ratings

Credit ratings assigned by Standard & Poor's are statements of opinion on the future credit quality of specific issuers or issues as of the date they are expressed and they are not indexes which show the probability of the occurrence of the failure to pay by the issuer or a specific debt and do not guarantee creditworthiness. Credit ratings are not a recommendation to purchase, sell or hold any securities, or a statement of market liquidity or prices in the secondary market of any issues.

Credit ratings may change depending on various factors, including issuers' performance, changes in external environment, performance of underlying assets, creditworthiness of counterparties and others. Standard & Poor's conducts rating analysis based on information it believes to be provided by the reliable source and assigns credit ratings only when it believes there is enough information in terms of quality and quantity to make a conclusion. However, Standard & Poor's does not perform an audit, due diligence or independent verification of any information it receives from the issuer or a third party, or guarantee its accuracy, completeness or timeliness of the results by using the information. Moreover, it needs to be noted that it may incur a potential risk due to the limitation of the historical data that are available for use depending on the rating.

This information is based on information Daiwa Securities Co. Ltd. has received from sources it believes to be reliable as of March 7th, 2017, but it does not guarantee accuracy or completeness of this information. For details, please refer to the website of S&P Global Ratings Japan Inc. (http://www.standardandpoors.co.jp)

The Name of the Credit Rating Agencies Group, etc
The name of the Credit Rating Agencies group: Moody's Investors Service ("MIS")
The name and registration number of the Registered Credit Rating Agency in the group: Moody's Japan K.K. (FSA commissioner (Rating) No.2)

How to acquire information related to an outline of the rating policies and methods adopted by the person who determines Credit Ratings

The information is posted under "Unregistered Rating explanation" in the section on "The use of Ratings of Unregistered Agencies" on the website of Moody's Japan K.K. (The website can be viewed after clicking on "Credit Rating Business" on the Japanese version of Moody's website (https://www.moodys.com/pages/default_ja.aspx)

Assumptions, Significance and Limitations of Credit Ratings

Credit ratings are Moody's Investors Service's ("MIS") current opinions of the relative future credit risk of entities, credit commitments, or debt or debt-like securities. MIS defines credit risk as the risk that an entity may not meet its contractual, financial obligations as they come due and any estimated financial loss in the event of default. Credit ratings do not address any other risk, including but not limited to: liquidity risk, market value risk, or price volatility. Credit ratings do not constitute investment or financial advice, and credit ratings are not recommendations to purchase, sell, or hold particular securities. No warranty, express or implied, as to the accuracy, timeliness, completeness, merchantability or fitness for any particular purpose of any such rating or other opinion or information, is given or made by MIS in

Based on the information received from issuers or from public sources, the credit risks of the issuers or obligations are assessed. MIS adopts all necessary measures so that the information it uses in assigning a credit rating is of sufficient quality and from sources MIS considers to be reliable. However, MIS is not an auditor and cannot in every instance independently verify or validate information received in the rating process.

This information is based on information Daiwa Securities Co. Ltd. has received from sources it believes to be reliable as of April 16th, 2018, but it does not guarantee accuracy or completeness of this information. For details, please refer to the website of Moody's Japan K.K. (https://www.moodys.com/pages/default_ja.aspx)

[Fitch]

The Name of the Credit Rating Agencies group, etc

The name of the Credit Rating Agencies group: Fitch Ratings ("Fitch")
The name and registration number of the Registered Credit Rating Agency in the group: Fitch Ratings Japan Limited (FSA commissioner (Rating) No.7)

How to acquire information related to an outline of the rating policies and methods adopted by the person who determines Credit Ratings

The information is posted under "Outline of Rating Policies" in the section of "Regulatory Affairs" on the website of Fitch Ratings Japan Limited (https://www.fitchratings.com/site/japan)

Assumptions, Significance and Limitations of Credit Ratings

Ratings assigned by Fitch are opinions based on established criteria and methodologies. Ratings are not facts, and therefore cannot be described as being "accurate" or "inaccurate" Credit ratings do not directly address any risk other than credit risk. Credit ratings do not comment on the adequacy of market price or market liquidity for rated instruments. Ratings are relative measures of risk; as a result, the assignment of ratings in the same category to entities and obligations may not fully reflect small differences in the degrees of risk. Credit ratings, as opinions on relative ranking of vulnerability to default, do not imply or convey a specific statistical probability of

In issuing and maintaining its ratings, Fitch relies on factual information it receives from issuers and underwriters and from other sources Fitch believes to be credible. Fitch conducts a reasonable investigation of the factual information relied upon by it in accordance with its ratings methodology, and obtains reasonable verification of that information from independent sources, to the extent such sources are available for a given security or in a given jurisdiction. The assignment of a rating to any issuer or any security should not be viewed as a guarantee of the accuracy, completeness, or timeliness of the information relied on in connection with the rating or the results obtained from the use of such information. If any such information should turn out to contain misrepresentations or to be otherwise misleading, the rating associated with that information may not be appropriate. Despite any verification of current facts, ratings can be affected by future events or conditions that were not anticipated at the time a rating was issued or affirmed.

For the details of assumption, purpose and restriction of credit ratings, please refer to "Definitions of ratings and other forms of opinion" on the website of Fitch Rating

This information is based on information Daiwa Securities Co. Ltd. has received from sources it believes to be reliable as of September 27th, 2019, but it does not guarantee accuracy or completeness of this information. For details, please refer to the website of Fitch Rating Japan Limited (https://www.fitchratings.com/site/japan)



IMPORTANT

This report is provided as a reference for making investment decisions and is not intended to be a solicitation for investment. Investment decisions should be made at your own discretion and risk. Content herein is based on information available at the time the report was prepared and may be amended or otherwise changed in the future without notice. We make no representations as to the accuracy or completeness. Daiwa Securities Co. Ltd. retains all rights related to the content of this report, which may not be redistributed or otherwise transmitted without prior consent.

Conflicts of Interest: Daiwa Securities Co. Ltd. may currently provide or may intend to provide investment banking services or other services to the company referred to in this report. In such cases, said services could give rise to conflicts of interest for Daiwa Securities Co. Ltd.

Daiwa Securities Co. Ltd. and Daiwa Securities Group Inc.: Daiwa Securities Co. Ltd. is a subsidiary of Daiwa Securities Group Inc.

Other Disclosures Concerning Individual Issues:

1) As of 26 April 2016, Daiwa Securities Co. Ltd., its parent company Daiwa Securities Group Inc., GMO Financial Holdings, Inc., and its subsidiary GMO CLICK Securities, Inc. concluded a basic agreement for the establishment of a business alliance between the four companies.

As of end-December 2017, Daiwa Securities Group Inc. owned shares in GMO Financial Holdings, Inc. equivalent to approximately 9.3% of the latter's outstanding shares. Given future developments in and benefits from the prospective business alliance, Daiwa Securities Group Inc. could boost its stake in GMO Financial Holdings, Inc. to up to 20% of outstanding shares.

- 2) Daiwa Real Estate Asset Management is a subsidiary of Daiwa Securities Group Inc. and serves as the asset management company for the following J-REITS: Daiwa Office Investment Corporation (8976), Daiwa Securities Living Investment Corporation (8986).
- 3) Samty Residential Investment became a consolidated subsidiary of Daiwa Securities Group Inc. effective 10 September 2019.
- 4) On 30 May 2019, Daiwa Securities Group Inc. formalized an equity/business alliance with Samty, and as of 14 June 2019 it owned 16.95% of shares outstanding in Samty along with convertible bonds with a par value of Y10bn. Conversion of all of said convertible bonds into common shares would bring the stake of Daiwa Securities Group Inc. in Samty to 27.28%.
- 5) Daiwa Securities Group Inc. and Credit Saison Co., Ltd. entered into a capital and business alliance, effective 5 September 2019. In line with this alliance, Daiwa Securities Group Inc. is to acquire up to 5.01% of Credit Saison's total common shares outstanding (excl. treasury shares; as of 31 Jul 2019).

6) NEC (6701): NOTICE REGARDING U.S. PERSONS: This report is not intended for distribution to or use by any person in the United States. Securities issued by NEC Corporation have been suspended from registration in the U.S. and are subject to an order of the U.S. Securities and Exchange Commission dated June 17, 2008, pursuant to Section 12(j) of the Securities Exchange Act of 1934. This document is not a recommendation or inducement of any purchase or sale of such securities by any person or entity located in the U.S. Daiwa Securities Co. Ltd. disclaims any responsibility to any such person with respect to the content of this document. Any U.S. person receiving a copy of this report should disregard it.

Notification items pursuant to Article 37 of the Financial Instruments and Exchange Law

(This Notification is only applicable to where report is distributed by Daiwa Securities Co. Ltd.)

If you decide to enter into a business arrangement with our company based on the information described in this report, we ask you to pay close attention to the following items.

- In addition to the purchase price of a financial instrument, our company will collect a trading commission* for each transaction as agreed beforehand with you. Since commissions may be included in the purchase price or may not be charged for certain transactions, we recommend that you confirm the commission for each transaction. In some cases, our company also may charge a maximum of \(\frac{\pmax}{2}\) million per year as a standing proxy fee for our deposit of your securities, if you are a non-resident.
- For derivative and margin transactions etc., our company may require collateral or margin requirements in accordance with an agreement made beforehand with you. Ordinarily in such cases, the amount of the transaction will be in excess of the required collateral or margin requirements**.
- There is a risk that you will incur losses on your transactions due to changes in the market price of financial instruments based on fluctuations in interest rates, exchange rates, stock prices, real estate prices, commodity prices, and others. In addition, depending on the content of the transaction, the loss could exceed the amount of the collateral or margin requirements.
- There may be a difference between bid price etc. and ask price etc. of OTC derivatives handled by our company.
- Before engaging in any trading, please thoroughly confirm accounting and tax treatments regarding your trading in financial instruments with such experts as certified public accountants.
- * The amount of the trading commission cannot be stated here in advance because it will be determined between our company and you based on current market conditions and the content of each transaction etc.
- ** The ratio of margin requirements etc. to the amount of the transaction cannot be stated here in advance because it will be determined between our company and you based on current market conditions and the content of each transaction etc.

When making an actual transaction, please be sure to carefully read the materials presented to you prior to the execution of agreement, and to take responsibility for your own decisions regarding the signing of the agreement with our company.

Corporate Name: Daiwa Securities Co. Ltd.

Registered: Financial Instruments Business Operator, Chief of Kanto Local Finance Bureau (Kin-sho) No.108

Memberships: Japan Securities Dealers Association, The Financial Futures Association of Japan, Japan Investment Advisers Association, Type II Financial Instruments Firms Association