Document Requiring User Agreement (Written Explanation on Over-the-counter Crypto Asset Derivatives Trading)

(Written Explanation of Lightning FX and Lightning Futures Trading)

August 31, 2021
Please ensure that you have thoroughly read and understand the contents of this written explanation when trading over-the-counter derivatives of crypto assets.

When trading over-the-counter derivatives of crypto assets, the principle and profits can not be guaranteed and losses may be incurred. Trades that may result in large profits carry the risk of incurring large losses instead. Therefore, customers should only begin or continue to trade if the customers have a thorough understanding of not just the information contained in this explanation, but also the mechanisms and risks involved in trading. Customers should only trade when the customers’ resources, trading experience, and trading purpose are judged to be appropriate, and the customer should trade at their own responsibility.

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This written explanation is offered to customers based on Article 37-3 of the Financial Instruments and Exchange Act, as well as stipulations in the Written Explanation on Crypto Asset Derivatives Trading Regulations and Guidelines from the Japan Crypto Asset Trading Association.
### Important Notes Regarding the Risks of Trading Over-the-counter Derivatives of Crypto Assets

#### Fees
Trading fees are free, but swap points may be paid during a rollover (when an open position is not counter-sold on the same business day that are carried over to the next business day). Additionally, if the price disparity between Lightning FX and Lightning Spot (BTC/JPY) meets or exceeds 5%, each execution will incur an expense or reward called Lightning FX SFD (Swap For Difference).

#### Margin
When performing these trades, a margin deposit is required. More information on the method of calculating the required margin deposit can be found in the Details of Trading Explanation section below.

### Risks Involved in Trading Over-the-counter Derivatives of Crypto Assets

1) **Price Fluctuation Risks**
   When trading over-the-counter derivatives of crypto assets, losses may be incurred due to fluctuations in the price of the related crypto asset. Additionally, since the amount being traded may be comparatively larger than the amount required in the margin deposit, there is a possibility of incurring losses that exceed the amount in the margin deposit.
   Please note that unexpected or specific events, including but not limited to changes in the balance of supply and demand, fluctuating prices of commodities, fiat currency, or other markets, natural disasters, wars, changes to laws, regulations, statutes, and governments, and changes to crypto assets may cause drastic price fluctuations that can cause orders to fail to be fulfilled or execute as intended.
   There is also a risk that the price of the crypto asset may fall to zero. When using the same crypto asset as a margin deposit for the crypto asset used in a margin trade, holding a buy position may result in additional losses due to a decline in the crypto asset market in addition to valuation losses from margin trading.

2) **Risks Inherent to Crypto Asset Networks**
   1. Crypto assets are not the same as fiat currencies. They are composed of electronic data transactions that occur over the Internet. The value of virtual currencies is not guaranteed by an established party. Moreover, they are not necessarily backed by actual assets.
   2. Note that in the event of a blockchain divergence such as a hard or soft fork etc. prices may drastically drop or transactions may be made invalid after the fact. Before or after a blockchain divergence, the Company may set out a period of time during which transactions including, but not limited to, payments, deposits, and withdrawals of crypto assets cannot...
be performed. In cases that include, but are not limited to, where the Company deems that the split will not be permanent or other situations arise, the Company may stop supporting the relevant crypto asset, in whole or in part. The Company reserves the right to, in the event of a blockchain divergence or other change to crypto asset specifications, an airdrop, etc., decide whether to support a given crypto asset and the nature of the support therein. The Company waives all liability for damages sustained by customers or third parties due to non-support by the Company or discrepancies in and/or changes to the nature of the support provided therein.

3) The malicious implementation of 51% or more of the total computing power on the blockchain network of a crypto asset may result in risks such as: (1) the approval of fraudulent transactions; (2) the denial of legitimate transactions; (3) gaining a monopoly in mining.

3) Sell Out and other risks
If the Company determines that the customer’s margin maintenance rate has dropped below the standard we set, we may cancel all outstanding open positions based upon our Margin Call Rules and Sell Out Rules, regardless of your intent. Furthermore, if your margin maintenance rate drops below the standard we set, all of the outstanding positions in your bitFlyer FX account will be automatically counter-traded and settled (Sell Out Order). Even in the event of a loss cut, it is possible that the amount lost due to a dramatic and rapid change in the market will cause losses to exceed the margin deposit.

If there are losses that exceed the margin deposit, we will ask that you pay the difference.
Profit and loss (valuation), required margin, etc. are combined across Lightning FX and Futures order books (positions on different markets do not offset each other.) If customers hold a position on multiple order books, please be aware of the risks associated with sell outs due to precipitous market price fluctuations on a given order book. When trading in Over-the-counter Derivatives of Crypto Assets, ensure to consider your own financial recourses and investment objectives, and trade with a sufficient margin.

4) Liquidity Risk
Note that market changes or trading volume may cause a customer to be unable to close open positions or open new positions, and such changes may also result in transactions at undesirable rates. Where an order is delayed, either on the buy or sell side, it may take some time for the order to complete, or it may fail to fulfill.

5) Credit Risk
If the Company's operational or asset situation worsens, customers may be subject to losses in Lightning FX trades.
The company manages the margin deposits received from customers separately from the Company’s own funds.
6) Swap Point Risk
Regardless of fluctuations in the price of the crypto asset which is an underlying asset of the transaction, rolling over buy positions or sell positions of the product will result in payment of swap points. Depending upon changes in the price of the crypto asset which is the underlying asset of the transaction or changes in interest rates, swap points may change, and customers may not be able to receive beneficial swap points.

7) SFD (Swap For Difference) Risk
SFD is applied when the price disparity between Lightning FX and Lightning Spot (BTC/JPY) exceeds 5%. The price disparity may differ between the point in time when the position was opened and the point in time when the position is settled due to price fluctuations.

8) System Risks
1. Crypto asset trades performed by customers make use of an electronic trading system. There may be cases where a trade does not complete as intended or completes in an unintended manner due to factors such as customer error when entering data and/or other causes. Note that trades may not complete as intended based on the type of order or market conditions.
2. As a result of causes that include, but are not limited to, damage to the telecommunications networks, systems, and equipment used by the Company and customers, damage to a connection, natural disasters such as earthquakes, lightning, and fires, or cyber attacks, etc., the electronic trading system may be rendered unusable temporarily, and transmission of customer orders may be delayed, deleted, or fail to process, resulting in invalidation or completion in an unintended manner. Note that in the event of electronic trading system failure, all or part of the Company's services, including the execution of trades by the Company, may be suspended or restricted.
3. There may be a possibility that the Company's system calculates an abnormal crypto asset buy or sell price. The Company reserves the right to render the listed price invalid and cancel trades which have been completed in the event that the Company can reasonably determine that the listed price is, due to system abnormality or other causes, significantly different from the prevailing market price, incorrect, abnormal, or based on unfair valuations.

9) Risk of Slippage
When placing a market order, or a special order that contains a market order, there may be a difference between the price displayed on the trade interface and the actual execution price. The corresponding price difference (slippage) that occurs due to the time taken in the communication between the customer's device and the Company's systems or the time taken for processing order executions may result in an advantageous price or a disadvantageous price.
**Management Methods for Deposited Assets**

Funds received from customers are managed separately from the Company's assets in a JSF Trust and Banking Co., Ltd. or Sumitomo Mitsui Banking Corporation account. Crypto assets used as a margin deposit are clearly discernible from crypto assets that are owned by the Company in accordance with the Payment Services Act. The Company manages crypto asset data in a way that immediately identifies which crypto assets belong to customers. The Company manages all customers’ crypto assets in cold wallets. Some crypto assets are also managed using multisig.

**Summary of Cover Trading Partner**

The Company performs cover trades to mitigate the risk of price fluctuations in trades with customers. The Company's cover trading partner is detailed below.

Firm name: Aux Cayes FinTech Co. Ltd  
(corporation from the Republic of Seychelles)  
Name of competent supervising authority if applicable: None  
Business: Trading

**Other Important Notes**

Over-the-counter derivatives of crypto assets are not subject to cooling off as stipulated by Article 37-6 of the Financial Instruments and Exchange Act.
Structure of Over-the-counter Derivatives of Crypto Assets

More information on the trading methods for bitFlyer Lightning FX and bitFlyer Lightning Futures, including margin deposits, please read the Details of Trading Explanation below.

Summary of Over-the-counter Derivatives of Crypto Assets

A summary of the over-the-counter derivatives of crypto assets are on page 11.

Summary of Taxes

For more information on tax handling for crypto assets in Japan, please contact your local tax office or tax accountant. The current point of view of Japanese tax authorities on crypto assets is summarized as follows. However, this point of view is subject to change.

- Capital gains received from trading over-the-counter derivatives of crypto assets are subject to taxation as miscellaneous income.
- Tax exemptions on miscellaneous income from futures trading and deductions from losses incurred by balances brought forward in net settlement are excluded from miscellaneous income from over-the-counter derivatives trading of crypto assets.

Termination of Accounts

The Company may terminate a customer’s account in the event of the following.

- If the customer violates the rules in this document or any of the Company’s rules
  In some cases, customers incur bear losses from the settlement of some or all of the customer's open positions. In this situation, the customer shall be responsible for any losses incurred in the net settlement.
- If a reasonable amount of time has passed with no balance in the account of the assets corresponding to this agreement
  Customers who wish to close their account can make an account closure request through the inquiry form on the Company’s website. There are no fees for account closure.

Company Profile

Company name: bitFlyer, Inc.
Tentative financial instruments and exchange business (Class 1 financial instruments and exchange business) in accordance with Act No. 28 of 2019 Article 10; Clause 2
HQ: 9-7-1 Akasaka, Minato-ku, Tokyo 107-6233
Business purpose: Financial instrument exchange operator, crypto asset exchange operator
Member: Japan Crypto Asset Trading Association
Established: January 9, 2014
Capital stock: 2,061,191,378 JPY

Complaints and Consultations

Inquiries regarding trading and other services can be made through the following methods.

- **Inquiry Form:** [https://bitflyer.com/en-jp/contactpage](https://bitflyer.com/en-jp/contactpage)
- **Email:** info@bitflyer.com
- **Mailing address:** Midtown Tower 30F 9-7-1 Akasaka, Minato-ku, Tokyo 107-6230
  bitFlyer, Inc.
- **Call center:**
  Complaints: 03-6434-7624
  Unauthorized access or usage reporting: 03-6434-7957
  General Inquiries: 03-6434-5864
  o The call center is open from 9:30 to 17:30 (JST)
  o Only available in Japanese
Outside of the hours of operation, please make inquiries through the Company’s contact form (https://bitflyer.com/en-jp/contactpage). The Company will respond by email.

**Dispute Resolution Measures**

The non-profit organization, the Financial Instruments Mediation Assistance Center (FINMAC), may be used as a designated financial instruments exchange business complaints, conflict, and trouble resolution center in accordance with the Financial Instruments and Exchange Act. FINMAC is a public third-party organization and is not affiliated with the Company.

<table>
<thead>
<tr>
<th>Inquiries and Support</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Financial Instruments Mediation Assistance Center (FINMAC)</td>
<td>Daini Shoken Kaikan, Nihonbashi, Kayabacho 2-1-1, Chuo-ku, Tokyo 103-0025, Japan</td>
</tr>
<tr>
<td></td>
<td>Tel: 0120-64-5005</td>
</tr>
<tr>
<td></td>
<td>Reception Hours: Weekdays 9:00 - 17:00 (JST) (except national holidays)</td>
</tr>
</tbody>
</table>
Definitions

- **Execution**
  The completion of a paired buy and sell order for a financial instrument

- **Position**
  After a leveraged trade has been executed, it is held as a position until it is settled

- **Sell position**
  Unsettled position resulting from an executed sell order

- **Buy position**
  Unsettled position resulting from an executed buy order

- **Repurchase**
  Making a buy position in order to close a buy position

- **Crypto asset exchange operator**
  A company registered with the Financial Services Agency and local finance bureau that operates a crypto asset exchange

- **Financial instruments exchange operator**
  A company that is registered as a financial instrument exchange platform, such as a over-the-counter derivatives of crypto assets trading platform, in accordance with the Financial Instruments and Exchange Act

- **Net settlement**
  A method of settling the debt of a buy or sell position by paying or receiving the difference in price without performing an actual exchange of crypto assets and an equivalent value of currency. When performing countersales over-the-counter derivatives of crypto assets, the positions are bought and sold with counterparties. They buy and sell positions of crypto assets are offset and the difference is paid or received.

- **Slippage**
  The difference in price between when an order was placed and when an order was executed

- **Swap points**
  Swap points may be incurred when rolling over buy or sell positions, regardless of changes in the price of the underlying crypto asset. The Company shall determine swap points based on the status of interest rates on a daily basis. Swap points may change in accordance with changes in the price of the underlying crypto assets or interest rates.

- **Derivatives trading**
  A product with a price that is derived from the price of a corresponding asset. This includes futures and options trading.

- **Margin Call**
  This refers to the additional margins you must provide before the given due date if the amount of margin, etc. provided after adding or subtracting settlement profit/loss (valuation margin) falls under the maintenance margin at the specified time at the business day designated by the financial instruments exchange due to market fluctuations, etc., in derivative transactions.

- **Sell out**
  This refers that the financial instruments exchange make a compulsory settlement of the customer’s positions if your losses reach the predetermined amount, or the appropriate margin is not reached by the deadline. This is done for the purpose of preventing additional customer’s losses and risk management.

- **Rollover**
  In the case of over-the-counter derivatives of crypto assets, rollover refers to the transfer of unsettled positions to the next business day. Trades on Lightning FX generally do not have a deadline for settlement.

The definitions of other terms can be found here (https://bitflyer.com/en-jp/glossary)
Prohibited Actions for Trading Over-the-counter Derivatives of Crypto Assets

In accordance with the Financial Instruments and Exchange Act, a financial instruments exchange operator acts as a counterparty and intermediary to customers for making trades of over-the-counter derivatives of crypto assets. When acting as an intermediary or representative, the following acts are prohibited.

1. The use of false information to execute a contract or solicit a contract for trades of over-the-counter derivatives of crypto assets with customers
2. Offering unreliable information in what can be deemed an assertive manner or making misleading declarations to execute a contract or solicit a contract for trades of over-the-counter derivatives of crypto assets with customers
3. Visiting or calling individuals who have not requested solicitation for a contract for trading over-the-counter derivatives of crypto assets in order to execute a contract or solicit a contract for trades of over-the-counter derivatives of crypto assets (does not include solicitations of individuals with whom the financial instruments exchange operator maintains a business relationship, the individual has made at least two trades of over-the-counter derivatives of crypto assets within one year of the date of solicitation, and the individual maintains a balance of unsettled over-the-counter derivatives of crypto assets)
4. Executing a contract for trading over-the-counter derivatives of crypto assets without confirming in advance if the corresponding customer has the intention to be solicited
5. Continuing to solicit the execution of a contract for trading over-the-counter derivatives of crypto assets to an individual who has indicated that the individual does not wish to be solicited (includes the indication to not continue receiving solicitations) for the execution of an over-the-counter trading of crypto assets contract
6. Soliciting the execution or cancelation of a contract for trading over-the-counter derivatives of crypto assets in-person or over the telephone at a time of day that is considered to be a nuisance for the individual receiving the solicitation
7. Offering an application or agreement to have the over-the-counter derivatives of crypto assets exchange operator or a third party wholly or partially compensate or provide supplemental funds to customers who incur losses or do not meet a predetermined level of profitability in trading over-the-counter derivatives of crypto assets
8. Making an application or promise to customers to have whole or partial compensation for losses or provide additional profits by the crypto asset exchange operator or a third party when trading over-the-counter derivatives of crypto assets to customers or designated individuals
9. Offering to give customers or third parties profits above the corresponding customer or third party’s assets in order to wholly or partially compensate customers’ losses or give additional profits in trading over-the-counter derivatives of crypto assets
10. Upon delivery of this document, failure to explain the details of this document so that customers understand the necessary knowledge, experience, status of assets, and purpose for executing a contract for trading over-the-counter derivatives of crypto assets
11. Expressing important matters in a way that creates a misunderstanding when executing or soliciting a contract for trading over-the-counter derivatives of crypto assets
12. Offering to provide or promising special profits to customers, designated parties, or third parties in a contract for trading over-the-counter derivatives of crypto assets (includes promises or offers to offer special profits to a third party)
13. Using deceit, violence, or coercion in order to execute or cancel a contract for trading over-the-counter derivatives of crypto assets
14. Having the contract for trading of over-the-counter derivatives of crypto assets wholly deny, partially deny, or unreasonably delay the ability to trade over-the-counter derivatives of crypto assets under an obligation from another foreign exchange margin trading contract
15. Using false market prices to calculate the amount of money, marketable securities, or other assets to be used as margin deposits or collateral that customers are required to hold as per the corresponding contract for trading over-the-counter derivatives of crypto assets
16. Gathering customers with the purpose of soliciting the execution of contracts for trading over-the-counter derivatives of crypto assets without expressly stating that fact to the corresponding customers in advance
17 Calculating a customer's over-the-counter derivative of crypto asset trades in advance without obtaining an agreement from the corresponding customer in advance

18 Having an individual financial instruments exchange operator, executive of a financial instruments exchange operator (includes an executive or corporate body that fills the role), or an employee of a financial instruments exchange operator use customers' trading order trends of over-the-counter derivatives of crypto assets or other specific information obtained in the course of the corresponding employee's duties for the purpose of pursuing wholly speculative profits in trading over-the-counter derivatives of crypto assets

19 For trades of over-the-counter derivatives of crypto assets, upon obtaining the customer's agreement for total amount of funds, in cases where agreement is not obtained regarding types of buying or selling, combinations of crypto assets, or volume and prices of trades, determining trade decisions by computers or predefined methods; pursuant to these predefined methods, when financial instrument exchange operators execute a contract to perform trades, the corresponding financial instruments exchange operator shall not do so in writing (excludes cases where a digital information processing structure or other information transmission technology method is used for execution)

20 When a customer trades over-the-counter derivatives of crypto assets, making solicitations or other similar actions to customers for equivalent purchase or sale trades of over-the-counter derivatives of crypto assets (refers to trades that are performed in order to mitigate losses from the preceding trades)

21 When trading over-the-counter derivatives of crypto assets, if a customer places a new order with an insufficient amount of funds to achieve 25% of the principle in the corresponding customer's collateral account (includes calculations of profit and loss), executing the corresponding trade without promptly requiring the customer to deposit the insufficient amount of collateral once the order has been created

22 When trading over-the-counter derivatives of crypto assets, at a designated point in time on each business day, if a customer's deposited collateral is less than 25% of the principle (includes calculations of profit and loss), executing the corresponding customer's trades without having the customer deposit the insufficient amount of collateral
Details of Trading Explanation

1. Trading types

bitFlyer Lightning FX and bitFlyer Lightning Futures are trading platforms for over-the-counter derivatives of crypto assets.

2. Trading methods

bitFlyer Lightning FX and bitFlyer Lightning Futures are not financial instruments markets or foreign exchange markets. bitFlyer Lightning FX and bitFlyer Lightning Futures are platforms for matching customers who wish to buy and sell over-the-counter derivatives of crypto assets.

The prices of trades are determined by the principle auction trading. The principle of auction trading is the principle of prioritizing price (buyers aim for the lowest price while sellers aim for the highest price, limit orders have a designated price, market orders do not have a designated price) and the principle of prioritizing time (orders that were placed first are prioritized over other orders for the same price).

The Company may place orders on bitFlyer Lightning FX and bitFlyer Lightning Futures in order to provide liquidity. These orders are not placed with the intention of obtaining profit, but for ensuring that there are enough buy and sell orders on bitFlyer Lightning FX and bitFlyer Lightning Futures. When the Company places orders, the Company shall not perform front-running*, use customers’ trading information, prioritize the processing of the Company’s orders, prioritize the Company’s orders in the event of any system malfunction, or any other form of inappropriate trading.

*Front-running refers to the act of an operator using customers’ order information in order to place an order before other customers’ orders are placed.

3. Order reception and execution policy

- Handled currencies, pairs, and order sizes

Please reference the table below for maximum and minimum order sizes and limitations on volume (position) sizes that can be held for each service and currency.

**Lightning FX**

<table>
<thead>
<tr>
<th>Currency Pair</th>
<th>Unit</th>
<th>Minimum Order Size</th>
<th>Maximum Order Size</th>
<th>Held Position Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>BTC-FX/JPY</td>
<td>BTC-FX</td>
<td>0.01</td>
<td>1,000</td>
<td>1,000</td>
</tr>
</tbody>
</table>

**Lightning Futures**

<table>
<thead>
<tr>
<th>Futures Type</th>
<th>Unit</th>
<th>Minimum Order Size</th>
<th>Maximum Order Size</th>
<th>Held Position Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Weekly futures</td>
<td>BFT</td>
<td>0.001</td>
<td>1,000</td>
<td>1,000</td>
</tr>
<tr>
<td>Biweekly futures</td>
<td>BFT</td>
<td>0.001</td>
<td>1,000</td>
<td>1,000</td>
</tr>
<tr>
<td>Quarterly futures</td>
<td>BFT</td>
<td>0.001</td>
<td>1,000</td>
<td>1,000</td>
</tr>
</tbody>
</table>

- Measures to Prevent Sudden Fluctuations in Trade Prices

To prevent sudden price changes, bitFlyer Lightning FX and bitFlyer Lightning futures have a circuit breaker system. A circuit breaker temporarily suspends trading in order to prevent erroneous order placement.
The circuit breaker system is summarized below.

<table>
<thead>
<tr>
<th>Activation Conditions</th>
<th>The placement of an order which causes the market price to fall outside of the price fluctuation threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>Circuit Breaker Reference Price</td>
<td>The last traded price from 10 minutes prior</td>
</tr>
<tr>
<td>Price Fluctuation Threshold</td>
<td>20% above or below the circuit breaker reference price</td>
</tr>
<tr>
<td>Suspension Period</td>
<td>About 5 minutes</td>
</tr>
<tr>
<td>Resumption Procedure</td>
<td>Trading will resume by the Itayose method after the suspension period has elapsed</td>
</tr>
</tbody>
</table>

*Orders may be placed and cancelled while trading is temporarily suspended.  
*If there have been no trades for 10 minutes, the reference price remains at its most recent value.  
*The single price determined by the Itayose method is taken as the circuit breaker reference price for the duration of the 10 minute period following the resumption of trading.  
*When trading is temporarily suspended due to circuit breaker activation and the single price determined by the Itayose method falls outside of the price fluctuation threshold, another period of suspension will immediately follow without resumption of trading. The reference price of this new period will be the price at which the price fluctuation threshold was exceeded.  
*There may be situations where the Company does not apply the circuit breaker if the Company determines that, in consideration of trading conditions, applying a temporary suspension to trading is not appropriate.  
*The Company will make a determination as to whether to temporarily suspend trading on each occasion that the circuit breaker activation conditions are met. There may be a time difference between the satisfaction of those conditions and the commencement of a suspension.  
*If the regularly scheduled maintenance time starts while the circuit breaker is activated, the circuit breaker Itayose process will take priority over the maintenance period.  
*The circuit breaker system is not guaranteed to activate for every order made in error. Please refer to the outline above for the activation conditions.  
*Any opportunity losses, including those due to the introduction of the circuit breaker system, are under no circumstances the responsibility of the Company.

The Itayose method searches for a price by sequentially matching buy and sell orders using the prescribed priority while making quantitative matches, and then makes purchases and sales using a single price. The order of priority is as follows.

**Sell order**
1: Market orders   2: lowest price limit order

**Buy order**
1: Market orders   2: highest price limit order

If there are multiple limit orders at the same price, the orders will be executed in the order they were placed. All market orders placed before the single-price auction (Itayose method) is determined (including orders placed prior to scheduled maintenance) will be considered to have been placed at the same time.

* Lightning FX trading rules

These rules explain Lightning FX trading. All times listed are in Japan Standard Time (JST). Trades on Lightning FX (opening an account, placing an order, exchanging funds, etc.) take place on the Internet. In principle, we do not accept trades made by telephone.

**i) Trading days and hours**
1) Trading days
Lightning FX trades are generally available every day.

2) Trading and order reception hours
Lightning FX trades can be made during the following hours.
24 hours/day, 365 days/year
*Periodic maintenance is scheduled to occur every day from around 4:00 AM to 4:10 AM. The start and end times are subject to change.

Orders

1) Order reception hours
Order can be received 24 hours/day, 365 days/year, excluding maintenance periods.

2) Trade types
The following types of trades are available.

1. New
   - When a customer places an order through Lightning FX, the customer must first make a margin deposit.
   - Only orders within the customer’s available margin can be placed. The available margin is calculated by subtracting the margin required for the position and the margin required for the order from the customer’s appraised margin amount.

2. Settlement
   - Settlement of open positions can be made by either a counter-traded settlement or physical delivery.
   - The Company accepts requests for physical delivery of 1 to 100 BTC to settle positions. Physical delivery settlements are limited to one per week per customer. Please use the Company’s contact form to request a physical delivery. The fee in Japanese Yen is calculated by the following formula: your position's weighted average execution price x position size x 20%. The position's average execution price will be determined by bitFlyer on the following business day after instructions and other details are provided. A request for physical delivery cannot be cancelled.

*First-in first-out (FIFO) applies to settlements. If the customer holds an open position, the order is a settlement order. If the customer does not hold an open position, it is a new order.

Settlement orders are settled in order from oldest to newest. Ordered quantities in excess of the amount that can be settled are processed as new orders.

*If a Lightning FX settlement order can not be processed, the position is automatically rolled over to the next business day. Therefore, these orders do not have settlement deadlines. However, the Company may choose to impose a settlement deadline.

*bitFlyer reserves the right to refuse any requests physical delivery settlements if there is any evidence or suspicion of criminal activity, activities based on false information, activities that violate the bitFlyer terms of service, or any other activities deemed in violation by bitFlyer.

*The time required for order instructions may differ between the Company’s designated trading interface and bitFlyer Lightning API.

3) Order and execution types
| Special orders | IFD: An abbreviation of “If Done”, If two orders are made at the same time and the first one is filled, then the second order is automatically placed.  
OCO: An abbreviation of “One-Cancels-the-Other”, when two orders are made at the same time and one is completed, the other side is automatically cancelled.  
IFDOCO: A combination of IFD and OCO, After an IFD order is filled, the OCO order is automatically placed. |
| --- | --- |
| Order types | Market order: This is where an order is placed with no price specified, emphasizing the filling of the order above other parameters. A buy order without limit will be filled with the lowest available offer at that time. A sell order without limit will be filled with the highest available offer at that time.  
Price limit order: A price limit order is an order placed to be filled at the price specified. With a buy order with price limit, the order will not be filled unless a price below that specified is found. For a sell order with price limit, the order will not be filled unless a price above that specified is found.  
Stop order: A stop order is a market order without limit that incorporates the following parameters: If the price reaches above the trigger price, buy; and if the price drops below the trigger price, sell.  
Stop limit order: If the price reaches above the trigger price, buy; and if the price drops below the trigger price, sell. |
| Notes on the difference between stop orders and stop limit orders | The difference between the above two order types is that, for stop orders, once the trigger price is reached, a market order without limit is placed. A stop limit order, by contrast, is when a price limit order is placed once the trigger price is reached. With a stop limit order, an order will never be filled at a price more unfavorable than the one specified in the price limit. However, due to price fluctuations, the order may not be filled.  
Trailing stop order: A trailing stop order is where the trigger price for a stop order is automatically calibrated based on price fluctuations. |
| Time in Force | Good 'Til Canceled (GTC): A Good 'Til Canceled order is one where the order remains in effect until it is either filled or cancelled.  
Immediate or Cancel (IOC): With an Immediate or Cancel order, all or part of the order is immediately filled if a match is found for the price indicated or better. Orders that fail to fill are canceled in their entirety.  
Fill or Kill (FOK): This refers to when the order is cancelled if the volume is not immediately executed (filled) in its entirety. |
| *Please note that the same order type will be applied to the second order when you place IFD or IFDOCO. |
4) Order validity period
If no order expiration date is specified, the order will be valid for 30 days. However, orders may be withdrawn due to factors such as service updates.

5) Order cancellation
Orders that have not been executed are generally able to be cancelled.

6) Expiration of orders
Orders will expire under any of the following conditions.
   1. If the order has exceeded the expiration date as defined in 4)
   2. When the margin goes below 100% of the maintenance margin rate, all new orders are void as of the time of the decrease.
   3. Orders may expire (be cancelled) during system maintenance.

7) Trading limitations
The following trading limitations may be imposed if the Company determines that there are or may be abnormalities in Lightning FX trades for all customers or individual customers. The main trade limitations are as follows.
   ● Increase in margin rate
   ● Limitations on quantities of orders or open positions
   ● Limitations or prohibitions on certain types of orders
   ● Suspension or interruption of trading
   ● Temporary changes to trading hours
   ● Activation of the circuit breaker

● Lightning Futures trading rules
Please thoroughly read and understand the following rules before trading on Lightning Futures (Bitcoin Futures).
Trades on Lightning Futures (includes opening accounts, placing orders, making deposits and withdrawals, etc.) occur entirely on the Internet (the Company generally does not take orders by telephone).

Product types and maturity dates
The Company offers futures with three different types of maturity dates.
   ● Weekly futures (matures on the upcoming Friday)
   ● Biweekly futures (matures one week after the maturity date of the one week futures)
   ● Quarterly futures (matures on the last Friday of March, June, September, and December)
*The next quarterly futures will be listed two weeks before the maturity date of the current one.
The maturity date is displayed as follows.
For example, "BTC/JPY-11MAY2018" matures on May 11, 2018.

Maturity schedule
10:00
Commence taking orders (after commencement, orders will not be executed until the market opens) for futures trades with a new maturity date by the Itayose method
10:30
Open futures trades with a new maturity date (after which, trading will commence as usual)
11:00
Update aliases for futures trades for the new maturity date
Stop futures trades that have reached their maturity date
12:00
Commence BTC spot board Itayose method
12:05
An SQ price is determined by the spot board
12:30
Commence settling positions by using the SQ price determined by the spot board
As necessary, the results of the execution will be displayed after the net settlement has been completed.

The schedule above is an approximation. It may change due to various circumstances.

i) Trading days and hours

1) Trading days
Lightning Futures is generally available every day.

2) Trading and order reception hours
Lightning Futures trades can be made during the following hours.
24 hours/day, 365 days/year
*Periodic maintenance is scheduled to occur every day from around 4:00 AM to 4:10 AM. The start and end times are subject to change.

ii) Orders

1) Order reception hours
Order can be received 24 hours/day, 365 days/year, excluding maintenance periods.

2) Types of trades
The following types of trades are available.

1. New
   - When you place an order with Lightning Futures, you must first deposit a margin into your Lightning FX/Futures account.
   - Only orders within your available margin can be placed. (Your available margin is calculated by subtracting the margin required for the position and the margin required for the order from your appraised margin amount.)

2. Settlement
   - Settlement of open positions can be made by either a counter-traded settlement or physical delivery.
   - If a position is not settled by counter-trade by the maturity date, the position will automatically be settled at the settlement price (SQ) determined on the maturity date.

*First-in first-out (FIFO) applies to settlements. If you hold an open position, the order is a settlement order. If you do not hold an open position, it is a new order.

When placing settlement orders, they are settled in order from oldest to newest. Ordered quantities in excess of the amount that can be settled are processed as new orders.

*If a Lightning Futures settlement transaction cannot be processed, the position is automatically carried over to the next business day. If a margin is not settled by reverse trade by the maturity date, the position will automatically be settled at the settlement price (SQ) determined on the maturity date.

*The time required for order instructions may differ between the Company's designated trading interface and bitFlyer Lightning API.

3) Order and execution types
<table>
<thead>
<tr>
<th>Special orders</th>
<th>IFD: An abbreviation of “If Done”, If two orders are made at the same time and the first one is filled, then the second order is automatically placed.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>OCO: An abbreviation of “One-Cancels-the-Other”, when two orders are made at the same time and one is completed, the other side is automatically cancelled.</td>
</tr>
<tr>
<td></td>
<td>IFDOCO: A combination of IFD and OCO, After an IFD order is filled, the OCO order is automatically placed.</td>
</tr>
<tr>
<td>Order types</td>
<td>Market order: This is where an order is placed with no price specified, emphasizing the filling of the order above other parameters. A buy order without limit will be filled with the lowest available offer at that time. A sell order without limit will be filled with the highest available offer at that time.</td>
</tr>
<tr>
<td></td>
<td>Price limit order: A price limit order is an order placed to be filled at the price specified. With a buy order with price limit, the order will not be filled unless a price below that specified is found. For a sell order with price limit, the order will not be filled unless a price above that specified is found.</td>
</tr>
<tr>
<td></td>
<td>Stop order: A stop order is a market order without limit that incorporates the following parameters: If the price reaches above the trigger price, buy; and if the price drops below the trigger price, sell.</td>
</tr>
<tr>
<td></td>
<td>Stop limit order: If the price reaches above the trigger price, buy; and if the price drops below the trigger price, sell.</td>
</tr>
<tr>
<td></td>
<td><strong>Notes on the difference between stop orders and stop limit orders</strong></td>
</tr>
<tr>
<td></td>
<td>The difference between the above two order types is that, for stop orders, once the trigger price is reached, a market order without limit is placed. A stop limit order, by contrast, is when a price limit order is placed once the trigger price is reached. With a stop limit order, an order will never be filled at a price more unfavorable than the one specified in the price limit. However, due to price fluctuations, the order may not be filled.</td>
</tr>
<tr>
<td></td>
<td>Trailing stop order: A trailing stop order is where the trigger price for a stop order is automatically calibrated based on price fluctuations.</td>
</tr>
<tr>
<td></td>
<td>*Please note that the IFD (the second order), stop orders, stop limit orders and trailing stop orders will not be placed or executed in the case of a margin shortage when actually trying to place an order. Please understand that should any special orders be triggered just before service is suspended (includes maintenance), there is the possibility that they will be executed once the service resumes. If the service resumes under the Itayose method, the order will use the corresponding Itayose method.</td>
</tr>
<tr>
<td>Time in Force</td>
<td>Good 'Til Canceled (GTC): A Good 'Til Canceled order is one where the order remains in effect until it is either filled or cancelled.</td>
</tr>
<tr>
<td></td>
<td>Immediate or Cancel (IOC): With an Immediate or Cancel order, all or part of the order is immediately filled if a match is found for the price indicated or better. Orders that fail to fill are canceled in their entirety.</td>
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<tr>
<td></td>
<td>Fill or Kill (FOK): This refers to when the order is cancelled if the volume is not immediately executed (filled) in its entirety.</td>
</tr>
<tr>
<td></td>
<td>*Please note that the same order type will be applied to the second order when you place IFD or IFDOCO.</td>
</tr>
</tbody>
</table>
4) Order validity period
If no order expiration date is specified, the order will be valid for 30 days. However, orders may be withdrawn due to factors such as service updates.

5) Order cancellation
Orders that have not been executed are generally able to be cancelled.

6) Expiration of orders
Orders will expire under any of the following conditions.

1. If the order has exceeded the expiration date as defined in 4)
2. When the margin goes below 100% of the maintenance margin rate, all new orders are void as of the time of the decrease.
3. Orders may expire (be cancelled) during system maintenance.

7) Trading limitations
The following trading limitations may be imposed if the Company determines that there are or may be abnormalities in Lightning Futures trades for all customers or individual customers. The main trade limitations are as follows.

- Increase in margin rate
- Limitations on quantities of orders or open positions
- Limitations or prohibitions on certain types of orders
- Suspension or interruption of trading
- Temporary changes to trading hours
- Activation of the circuit breaker
- Margin deposits

Margin Deposit
Before being able to trade on Lightning FX and Lightning Futures, it is necessary to make a margin deposit. Customers may deposit margins by transferring Japanese yen or Bitcoin from your bitFlyer account. You may also transfer amounts to your trading account within the limits of either the amount left over after subtracting the margin amount needed to maintain your positions/orders from the variation margin, or the margin deposit, whichever is lower.

For Lightning FX and Lightning Futures, the Company regularly confirms the status of customers' margin deposits. If the maintenance margin rate falls below a certain standard, and meets the predetermined criteria, the Maintenance Margin Rules, Margin Call Rules, and Sell Out Rules will apply.

The required margin is calculated by multiplying the margin rate and the order size.

<table>
<thead>
<tr>
<th>Margin rate (personal accounts)</th>
</tr>
</thead>
<tbody>
<tr>
<td>50% (for 2x leverage) - 100% (for 1x leverage)</td>
</tr>
</tbody>
</table>

- Margin rate may be changed at the Company's discretion.
- The margin rate of corporate accounts is calculated based on the assumed crypto assets risk ratio and fluctuates on a weekly basis. The leverage fluctuation will be released on our website every week. Please refer to our website for more details. (The assumed crypto asset risk ratio is calculated by the Commissioner of the Financial Services Agency. The method uses the ratio of the risk from price fluctuations that occur in the crypto asset market to the principal amount.)
- Profit and loss (valuation), required margin, etc. are combined across the Lightning FX and Lightning Futures order books.
- Please note that positions on different markets do not offset each other in calculation of required margin.

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Terms related to margin deposits and profit and loss are defined as follows.

<table>
<thead>
<tr>
<th>Margin deposits, profit and loss</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Profit or loss from valuation</td>
<td>(P/L of acquired open positions) + (swap P/L) - (fees)</td>
</tr>
<tr>
<td>Margin deposit</td>
<td>This is the amount of deposited JPY. *The value of your Bitcoin margin deposit is calculated at 50% of the last traded price of Lightning Spot (BTC) market in Japanese yen.</td>
</tr>
<tr>
<td>Required margin</td>
<td>This is the current required margin deposit for open positions and new orders. (Required margin for open positions) + (Required margin for new order)</td>
</tr>
<tr>
<td>Valuation margin</td>
<td>Margin Deposit + Profit or loss from valuation</td>
</tr>
<tr>
<td>Maintenance margin</td>
<td>This is the ratio of Valuation Margin to the Required Margin. This ratio evaluates the criteria of a sell out. Valuation margin / Required margin</td>
</tr>
<tr>
<td>Amount available for withdrawal</td>
<td>This is the amount that can be withdrawn. The smaller of (Valuation Margin - Required Margin) or Margin Deposit. However, a withdrawal may be limited by other conditions.</td>
</tr>
<tr>
<td>Profit or loss from valuation of an acquired open position</td>
<td>This is the profit or loss valuation for the open position.</td>
</tr>
<tr>
<td>Profit or loss from unsettled swap points</td>
<td>This is the total amount of unsettled swap points.</td>
</tr>
<tr>
<td>Fees</td>
<td>This is the fee for the trade.</td>
</tr>
<tr>
<td>New open position</td>
<td>This is a new order creating an open position.</td>
</tr>
<tr>
<td>Repayment order</td>
<td>This order repays the amount of an existing open position.</td>
</tr>
<tr>
<td>Open position required margin</td>
<td>This is the required amount of margin deposit for the open position. This is the total amount of (Execution Price * Position Size * Margin Rate) for each open position. (Values are rounded up after the decimal point.)</td>
</tr>
<tr>
<td>Order required margin</td>
<td>This is the Required Margin for a specific order. This is the total amount of [Order price * Position Size * Margin Rate] on each order. (Values are rounded up after the decimal point.)</td>
</tr>
<tr>
<td>Combined open interest</td>
<td>The maximum number of positions you can hold are 1,000 BTC-FX, 1,000 BFT per sheet (including order amounts).</td>
</tr>
</tbody>
</table>

- **Maintenance Margin Rules**
  - If the maintenance margin rate falls below 100%, the Maintenance Margin Rules will apply.
• All outstanding new orders will be revoked (cancelled) ( “New orders” shall mean the orders which increase the customer's position.)

• When the maintenance margin rate is below 100%, transferring out your margin deposit from your margin accounts (Japanese yen and Bitcoin) to spot accounts, or placing new orders will be suspended.

• There may be delays in the Maintenance Margin Rules being applied. The Company will not be held liable for any losses incurred as a result of such delays.

• **Margin Call Rules**

The Margin Call Rules are as follows:

1. If the maintenance margin rate is below 100% at 6:00 PM every business day (including weekends and holidays), Margin Call Rule will apply and a margin call will occur.
2. All outstanding new orders will be revoked (cancelled).
3. If the margin call has not been resolved by 4:59 PM (JST) on the next business day (including weekends and holidays) after the margin call is triggered, Sell Out Rules will apply at 5:00 PM (JST). The methods of resolving the margin call are as follows.
   • Deposit Japanese yen or Bitcoin into your margin account
   • Partial or complete settlement of your positions
   • Increase the leverage rate*
   *

   *If the leverage rate is set lower than the maximum value, it can be raised to resolve the margin call. It will not be raised if you have selected the maximum leverage rate.

• Please note that even if the maintenance margin rate exceeds 100% by methods other than listed above (market fluctuation, etc.), after the margin call is triggered, the margin call will not be resolved.

• If the market has changed abruptly, the Sell Out Rules is applied before the Margin Call Rules are applied.

• It may take time for the amount of the Margin Call to be reflected on the trade screen even after all or part of the Margin Call clears. If the amount is not reflected, wait for a moment and try again.

• There may be delays in the Margin Call rules being applied. The Company will not be held liable for any losses incurred as a result of such delays.

• **Sell Out Rules**

The Sell Out Rules are as follows:

• If the maintenance margin rate falls below 50%, or based on the Margin Call Rules, if the margin call has not been resolved by 4:59 PM (JST) of the next business day (including weekends and holidays) after the margin call is triggered, the Sell Out Rules will apply at 5:00 PM (JST).

• We will close all of your positions on Lightning FX/Futures (Sell Out order). Sell Out orders involve market orders on all positions for settlement purposes

• Trade may not be resumed until settlement orders on all positions are finalized.

• There may be delays in the Sell Out Rules being applied. The Company will not be held liable for any losses incurred as a result of such delays.
**Transfer Payments (inward and outward) for Margins**

1. Transfer in (Spot Account to Lightning FX/Futures Account)
   - Transfers in can be made 24 hours a day, 365 days a year.
   - Deposit margins will be increased as soon as transfer is completed.
   - Transfers can be made within the range of the transferable amount in your bitFlyer account.

2. Transfer out (Lightning FX/Futures Account to Spot Account)
   - Transfers out can be made 24 hours a day, 365 days a year.
   - Margin Deposit will be decreased as soon as transfer is completed.
   - Transfers can be made within the range of the transferable amount in your Lightning Futures account.

As a rule, transfers can be made 24 hours a day, 365 days a year. However, the following times are excluded:
- During system maintenance

**4. Response to Large-scale Blockchain Divergences**

1. Method of reporting to users
   - In the event that a crypto asset handled by the Company is scheduled to undergo a large-scale update where backward and forward compatibility will be lost (“hard fork”), the Company shall report the Company’s response to the hard fork, including the beginning and end of temporary suspensions of services related to the corresponding crypto asset, to customers on the Company’s website, through email, and other communication channels that the Company deems appropriate. Additionally, if the corresponding crypto asset is the underlying asset in leverage trading or if the corresponding leverage trade is linked to a crypto asset index, the communication channels above will be used.

2. Service suspension measures for when a hard fork occurs
   - In the event of a hard fork, the Company may suspend purchases, sales, deposits, withdrawals, etc. for a period of time determined by the Company. The Company shall consider when to make and lift a temporary suspension of services based on a comprehensive assessment of the risks of losing mutual compatibility, retroactive invalidation of trades, large declines in price, etc. Additionally, withdrawals of fiat currency and crypto assets will be unavailable during the suspension period and available once service resumes. In the event that any customers incur losses due to price movement, etc. during the suspension period, the Company shall bear no responsibility for the corresponding losses incurred.

3. Granting a new crypto asset that originates in a hard fork to customers
   - The Company shall decide whether or not to handle any new crypto assets originating in a hard fork or the crypto asset that underwent the hard fork itself. As a result, the Company may choose not to grant any new crypto assets, and the Company is not responsible for any losses incurred by customers by not granting any new crypto assets.

4. Fees required for granting new crypto assets
   - In order to cover the costs incurred in building the necessary systems for operations, measures for customer protection, etc. required for the new crypto asset the Company may collect a fee from customers when granting a new crypto asset.

5. Rights adjustments for leverage trading of new crypto assets
   - The Company may collect fees from customers to cover the costs of building the systems used in operations that accompanies rights adjustments for leverage trading of new crypto assets.

6. Method for rights adjustments for positions in leverage trading when a new crypto asset is issued or granted
   - The Company shall inform customers in advance of the method to be used for rights adjustment for each time rights are adjusted for positions in leverage trading when a new crypto asset is issued or granted.

7. The Company’s response guidelines for planned hard forks and new crypto assets
   - The Company’s response guidelines for expected blockchain divergence resulting from a hard fork and new crypto assets resulting from a hard fork can be found here

5. Fees

Lightning FX may require margin deposits, swap points, and SFD. Lightning Futures may require margin deposits and swap points.

Lightning FX/Futures Swap points *5
Swap points are calculated at 00:00:00 for the previous day. Swap points are added to or subtracted from positions at the time of settlement.

<table>
<thead>
<tr>
<th>Position</th>
<th>Swap points</th>
</tr>
</thead>
<tbody>
<tr>
<td>Buy positions</td>
<td>The total of (the absolute value of open positions x 0.04% per day) (Base unit: JPY) *6</td>
</tr>
<tr>
<td>Sell positions</td>
<td></td>
</tr>
</tbody>
</table>

*5 Swap points may occur on Lightning FX and Lightning Futures.
*6 The total value of open positions is calculated by multiplying the total volume of open positions the customer holds by the closing price of the previous day.
Lightning FX/Futures Margins

<table>
<thead>
<tr>
<th>Margin Rate (personal accounts)</th>
<th>50% (2x Leverage) to 100% (1x Leverage)</th>
</tr>
</thead>
</table>

- The margin rate of corporate accounts is calculated based on the assumed crypto assets risk ratio and fluctuates on a weekly basis. The leverage fluctuation will be released on our website every week. Please refer to our website for more details. (The assumed crypto asset risk ratio is calculated by the Commissioner of the Financial Services Agency. The method uses the ratio of the risk from price fluctuations that occur in the crypto asset market to the principal amount.)

Lightning FX SFD (Swap For Difference)

When the price disparity between Lightning FX and Lightning Spot (BTC/JPY) reaches at least 5%, a Lightning FX SFD occurs at the time of execution and is applied when the position is settled. However, it will not be granted to settlement orders.

<table>
<thead>
<tr>
<th>Execution Type</th>
<th>New order</th>
<th>Settlement order</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executions that increase price disparity</td>
<td>Pays SFD</td>
<td>Pays SFD</td>
</tr>
<tr>
<td>Executions that decrease price disparity</td>
<td>Granted SFD</td>
<td>NO SFD</td>
</tr>
</tbody>
</table>

- Price Disparity is calculated as follows.
  Price Disparity (%) = \([\text{Last Lightning FX trade price} \div \text{Last Lightning Spot (BTC/JPY) trade price} - 1] \times 100\)

- SFD is calculated as follows.
  SFD (JPY) = execution amount \times \text{Lightning FX trade price} \times \text{SFD rate}

The SFD rate is determined as follows.

<table>
<thead>
<tr>
<th>Price Disparity</th>
<th>SFD rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>At least 5% but less than 10%</td>
<td>0.25% of the execution amount</td>
</tr>
<tr>
<td>At least 10% but less than 15%</td>
<td>0.50% of the execution amount</td>
</tr>
<tr>
<td>At least 15% but less than 20%</td>
<td>1.00% of the execution amount</td>
</tr>
<tr>
<td>At least 20%</td>
<td>2.00% of the execution amount</td>
</tr>
</tbody>
</table>

Lightning FX Spot Settlement Fees

The JPY amount is calculated as the weighted average execution price in the Lightning FX order book at a point in time at the Company’s discretion on the next business day after receiving the customer’s order \times position amount \times 20%.

6. Business Reports and the Most Recent Financial Documents

Explaination of the Characteristics of Crypto Assets

- Crypto assets can be used for tender of payment to non-designated parties as well as for purchases and sales with non-designated parties.
- With no issuer-set limitations, crypto assets can be exchanged for Japanese yen, other fiat currencies or other crypto assets, given there are exchange markets in place for trade among these currencies.

The Company handles the following crypto assets.

- Bitcoin

Bitcoin is a crypto asset. Bitcoin is not issued by a central bank or any specific organization. Bitcoin has an upper limit to the amount that can be issued. The practical value held by Bitcoin is derived from the trust placed in it by people. Blockchain technology, a distributed ledger that uses encryption technology, is used to store and transfer values.

This English translation is provided for convenience purposes only. The Japanese version of this document shall be regarded as the official version. In the event of a dispute, the Japanese language version shall prevail.

[Enacted on April 20, 2020]
[Amended on May 1, 2020]
[Amended on November 26, 2020]
[Amended on January 8, 2021]
[Amended on March 3, 2021]
[Amended on April 21, 2021]
[Amended on May 12, 2021]
[Amended on August 31, 2021]