Approved by order of Chief Executive Officer of ITS Tech Limited dated February 02, 2023 No. 02/01

Procedure

of Market data use for the purpose of Order Parameterisation in the Order Parameterisation Subsystem

1. Terms and Definitions

1.1. In this Procedure of Market data use for the purpose of Order Parameterisation in the Order Parameterisation Subsystem (Procedure) terms and definitions are used in the meanings defined in the Terms and Conditions of IT Support Service Provision of ITS Tech Limited (ITS Terms and Conditions) and International Trading System Limited Business Rules (Business Rules and International Trading System Limited, respectively).

2. Use of Market Data

2.1. for each Liquidity Pool (as defined in ITS Terms and Conditions), except for RFQ Liquidity Pool, the Technical Centre uses all available prices from the Order Queue (as defined in the Trading Rules) or all price levels of Market data (as defined in ITS Terms and Conditions) regarding Order prices (and amounts of securities corresponding to these prices indicated in the Order, hereinafter referred to as Order Volume), the value of which is no lower (higher) than the last (worse) purchase (sales) price in the Order Queue (or in Market data).

2.3. Technical Centre reasonably assumes that Market data from another trading operator is not up-todate and/ or complete, in particular, in the following cases:

1) if as a result of loss of a message/ messages from the update flow - in Market data from another trading operator the Order Parameterisation Subsystem in accordance with technology of Market data receipt from another trading operator is unable to receive data under the repeated message request algorithm and goes to the mode of recovery based on the market data slice flow till synchronisation of update flows and slices of aggregated order queue from another trading operator;

2) if during certain time from 2 to 10 seconds, which is a variable parameter of the technology aimed at Market data obtaining by the Order Parameterisation Subsystem from another trading operator, for neither Instrument (as defined in accordance with in ITS Terms and Conditions) update of data was from another trading operator on prices and volumes of purchase or sales orders from the Market data update flow, till renewal of normal receipt of information on the order queue in accordance with the technology of Market data receipt from another trading operator;

3) If International Trading System Limited obtains information on change in trading status at another trading operator to any status different from the Trading at the Operator are Held during the Continuous Auction Period status.

3. Order Parameterisation

3.1. Order Parameterisation is conducted in real time with the use of the Order Parameterisation Subsystem based on Requests (as defined in ITS Terms and Conditions) of Clients and Market data.

Order Parameterisation is conducted regarding Instruments, for which International Trading System Limited does not restrict the possibility to submit Orders with "Consolidate only with Additional Liquidity Orders". Information on restrictions regarding Orders with the said Instruction is disclosed in form of notes on the web-site of International Trading System Limited in the Trading Time section.

For the purpose of this Procedure, offsetting orders for a Request (Offsetting Orders) are:

3.1.1. active Orders for this Instrument that are in the Order Queue, with the direction (purchasing or sales) opposite to the direction of the Request submitted, based on which Orders Transaction can be executed in accordance with the Trading Rules (as defined in ITS Terms and Conditions) based on the Order containing parameters of the Request submitted;

3.1.2. prices for purchasing (sales) of this Instrument at another trading operator, information on which the Technical Centre obtains from International Trading System Limited, with the direction opposite to the direction of the Request submitted - for Market Orders (as defined in the Business Rules);

3.1.3. prices for purchasing (sales) of the Instrument at another trading operator, information on which the Technical Centre obtains from International Trading System Limited, with the direction opposite to the direction of the Request submitted, if such price for purchasing (sales) is not lower (higher) than the price indicated in Request for sales (purchasing) - for Limit Orders (Limit Orders have the meanings assigned to them in the Business Rules).

3.2. Response to a Request received by the Technical Centre prior to commencement of the Standard Additional Liquidity Period of the Main Trading Mode is a Limit Order or Market Order submitted, in the Main Trading Mode of the Exchange with the indication of Instruction "Do not consolidate with Additional Liquidity Orders (Standard Additional Liquidity Period, the Main Trading Mode and Instruction have the meanings assigned to them in the Business Rules).

3.3. Response to a Request received by the Technical Centre after commencement of the Additional Liquidity Period of the Main Trading Mode is a Limit Order or Market Order submitted in the Main Trading Mode with the indication of Instruction "Consolidate only with Additional Liquidity Orders" (Additional Liquidity Period has the meaning defined in the Business Rules).

3.4. Response to a Request received by the Technical Centre during the Standard Additional Liquidity Period of the Main Trading Mode is formed as follows:

3.4.1. if the volume of Offsetting Orders in the Main Liquidity Pool or Additional Liquidity Pool is zero, response to the Request contains relevant Instruction ("Consolidate only with Additional Liquidity Orders" or "Do not consolidate with Additional Liquidity Orders");

3.4.2. if volume of Offsetting Orders in the Main Liquidity Pool and Additional Liquidity Pool is no less, than the volume indicated in the Request:

3.4.2.1. for each Liquidity Pool, potential Transaction volume is calculated based on Request under the following formula:

$$Value_n = \sum_{i=1}^{I} P_i Q_i,$$

where:

• Value_n means potential Transaction volume for n-th Liquidity Pool;

• n = 1... N means Liquidity Pool order number, N means the total number of Liquidity Pools;

• i = 1... I means the number of Offsetting Orders in Market data of n-th Liquidity Pool, that is used to determine Parameters of the Orders in accordance with requirements for Market data used to define Offsetting Orders;

• Pi means price of one Instrument indicated in i-th Offsetting Order;

• Qi means the number of Instruments indicated in i-th Offsetting Order;

3.4.2.2. based on the potential volumes of Transactions, Instruction is defined, that indicates the Liquidity Pool indicated in the response to the Request:

• for Request for purchasing, response to the Request indicates

Instruction that indicates the Liquidity Pool, for which potential Transaction volume is lower;

• for Request for sales, response to the Request indicates Instruction that indicates the Liquidity Pool, for which potential Transaction volume is higher;

in case of equal potential volumes of Transactions in several

Liquidity Pools, response to the Request indicates the Instruction "Do not consolidate with Additional Liquidity Orders";

3.4.3. if volume of Offsetting Orders in the Main Liquidity Pool and Additional Liquidity Pool is below the volume indicated in the Request, but is not zero, and such Request is not a Request, in response to which a Limit Order is submitted that does not allow partial fulfillment (as defined in the Trading Rules):

3.4.3.1. for each Liquidity Pool, potential Transaction volume is calculated based on Request under the following formula:

$$Value_n = \sum_{i=1}^{I} P_i Q_i + P_o Q_o,$$

where:

Po means price of one Instrument having the following values depending on Liquidity Pool:

- for the Main Liquidity Pool: price of one Instrument indicated in Request (for Request, in response to which Limit Order is submitted), the upper Dynamic Limit (for Request for purchasing, in response to which Market Order is submitted) or the lower Dynamic Limit (for Request for sales, in response to which Market Order is submitted) set by the Exchange for relevant Instrument;

- for Additional Liquidity Pool: for Request for purchasing (sales) the lower (higher) of the following:

1) price of one Instrument equal to the price of the last price level (the highest price for purchase Request, the lowest price for sales Request) in Market data from another trading operator;

2) price of the Instrument defined by analogy with the procedure provisioned for Instrument price determination for the Main Liquidity Pool.

• Qo means the difference between the number of Instruments indicated in Request, and the number of Instruments in Offsetting Orders of n-th Liquidity Pool, in pcs.;

3.4.3.2. based on potential Transaction volumes, Instruction is defined, that indicates the Liquidity Pool indicated in the response to the Request:

• for Request for purchasing, response to the Request indicates Instruction, that Liquidity Pool, for which potential Transaction volume is lower;

for Request for sales, response to the Request indicates

Instruction, that indicates the Liquidity Pool, for which potential Transaction volume is higher;
in case of equal potential volumes of Transactions in several

• in case of equal potential volumes of Transactions in several Liquidity Pools, response to Request indicates the Instruction "Do not consolidate with Additional Liquidity Orders":

3.4.4. if volume of Offsetting Orders in the Main Liquidity Pool and Additional Liquidity Pool is below the volume indicated in the Request, and this Request is a Request, in response to which a Limit Order is submitted that does not allow partial fulfillment, response to the Request contains the Instruction "Consolidate only with Additional Liquidity Orders";

3.4.5. if volume of Offsetting Orders in the Main Liquidity Pool and Additional Liquidity Pool is zero, response to the Request contains the Instruction "Consolidate only with Additional Liquidity Orders".

3.5. If Request is received by the Technical Centre during the validity term of the Exchange notification on suspension of the Instrument Trading, response to Request is a Request for quotation of RFQ Trading Mode of the Exchange.

Notification of the Exchange on Instrument trading suspension is deemed valid from receipt of the said notification by the Technical Centre till receipt by the Technical Centre of the Exchange notification on the Instrument trading renewal.

Notifications of the Exchange indicated in this clause are sent to the Technical Centre using the internal protocol of interaction of the Platform subsystems (as defined by in ITS Terms and Conditions).

3.6. In cases provisioned in sub-clauses 1 - 2 of this clause, during the Standard Additional Liquidity Period of the Main Trading Mode of the Exchange response to Request indicates the Instruction "Consolidate only with Additional Liquidity Orders".

1) If, in view of clause 2 of this Procedure, Technical Centre reasonably assumes that Market data from another trading operator regarding Instrument indicated in Request, is not up-to-date and/ or complete;

2) If another trading operator has no Offsetting Orders for the Request.