

# Blue Ocean ATS Corporate Actions Policy

Blue Ocean ATS monitors and responds to corporate actions that affect listed securities. Each event type is handled according to its market impact to ensure orderly trading and accurate symbol management.

## Trading Halts

When a corporate action materially changes a security’s structure or identity, Blue Ocean temporarily halts trading.

Corporate Action	Description	Blue Ocean Business Action
<b>Merger or Acquisition</b>	Combination of two or more companies into one entity, involving an exchange of stock and/or cash for shareholders.	Advisement email, stock halted, orders rejected for session.
<b>New Listing</b>	Introduction of a newly listed security following corporate issuance.	Advisement email, stock halted, orders rejected for session.
<b>Reverse Stock Split</b>	Consolidation of existing shares into fewer, higher-priced shares.	Advisement email, stock halted, orders rejected for session.
<b>Spin-Off/ De-Merger</b>	Parent company distributes shares of a new independent entity (“spinco”) to existing shareholders.	Advisement email, stock halted, orders rejected for session.
<b>Forward Stock Split</b>	Increase in total shares outstanding, resulting in a lower share price.	Advisement email, stock halted, orders rejected for session.
<b>Symbol Change</b>	Change in the official ticker symbol.	Advisement email, stock halted, orders rejected for session.
<b>Full- Day Halt (ATS Rule)</b>	Trading paused for the full session due to a regulatory halt or issuer event.	Advisement email, stock halted, orders rejected for session.

# Continuing Trading

Corporate actions in this category do **not** interrupt trading.

Corporate Action	Description	Blue Ocean Business Action
<b>Bonus Issue</b>	Additional shares granted to existing shareholders, also known as a scrip or capitalization issue.	Trading continues.
<b>Liquidation Distribution/ Liquidating Dividend</b>	Cash distribution made during the dissolution of a company.	Trading continues.
<b>Cash Dividend</b>	Ordinary payment of cash to shareholders.	Trading continues.
<b>Optional Dividend</b>	Dividend payable in cash or shares at the shareholder's discretion.	Trading continues.
<b>Name Change</b>	Official change of the security's registered name.	Keep trading <b>unless</b> additional corporate actions are being taken, such as a symbol, CUSIP, SEDOL, or ISIN change.
<b>Return of Capital</b>	Cash distribution paid from capital surplus rather than earnings.	Trading continues.
<b>Right to Purchase</b>	Right granted to shareholders to buy shares at a fixed price within a defined period.	Trading continues.

# Delisting

Corporate Action	Description	Blue Ocean Business Action
<b>Delisting</b>	Removal of a listed security from an exchange, whether voluntary or involuntary. Common causes include mergers, bankruptcy, non-compliance, or privatization.	Security removed from symbol master. Broker-dealers are presumed notified.

## Case-by-Case

Certain corporate actions require review due to variations in issuer structure. Blue Ocean ATS determines the appropriate trading treatment on a case-by-case basis and will notify participants if any action is required.

Corporate Action	Description	Blue Ocean Business Action
<b>Cash and Stock Dividend</b>	Dividend paid in both cash and shares.	Case-by-case review.
<b>Stock Dividend</b>	Dividend paid in additional shares.	Case-by-case review.
<b>Rights Offering</b>	Shareholders receive the right to purchase new shares at a set price during a subscription period.	Case-by-case review.
<b>Stock Distribution of Another Security</b>	Shareholders receive shares of another security or class.	Case-by-case review.

## Policy Summary

Blue Ocean ATS follows regulatory obligations under its ATS filing for any full-day halts.

All participants are notified via official advisement email when a corporate action requires trading suspension.

Routine actions such as dividends, rights offerings, or bonus issues proceed without interruption.

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