

To Our Clients

June 1, 2009

Amended as of October 1, 2009

Citigroup Global Markets Japan Inc.

Placement of Orders to Exchanges in Foreign Countries

In accordance with Citigroup Global Markets Japan Inc. ("CGMJ")'s Conflicts Management Guidelines, which was established pursuant to Article 36, Paragraph 2 of the Financial Instruments and Exchange Law and Article 70-3, Paragraph 1, Item 3 of the Cabinet Office Ordinance Concerning Financial Instruments Exchange Business, Etc., CGMJ hereby gives notice that, in general, CGMJ places its clients' orders to exchanges in foreign countries through its overseas affiliated companies.