XX公司参与期权交易的内部控制、风险管理等相关制度

XX Company's Internal Control and Risk Management in Option Trading

一 总则

General provisions

第一条 为有效地利用期权来管理公司的经营风险，公司拟开展期权投资业务，为规范期权交易，防止风险，特制定本指引，请各相关部门遵照执行。

Article 1 In order to make effective use of options to manage the company's operational risks, the company intends to carry out options investment business. In order to standardize options trading and prevent risks, the present Guidelines are specially formulated. Relevant departments are requested to follow them.

第二条 公司参与期权的目的是为了管理市场经营中的风险（通过寻求市场低风险的投资机会）改善企业经营，本着谨慎、规范的原则进行期权交易。

Article 2 The purpose of the company's participation in options is to manage the risks in the market operation (by seeking low-risk investment opportunities in the market) and improve the operation of enterprises. The company conducts options trading on the principle of prudence and standardization.

二 业务机构的设置及职责

Establishment and Duties of Business Institutions

根据国家相关法律法规、制度的规定，结合本公司的实际情况，为顺利开展期权投资业务，控制相关风险，需增设以下机构和部门。

In order to smoothly carry out the option investment business and control the related risks, the following institutions and departments should be set up according to the relevant laws, regulations and regulations of the state and the actual situation of the company.

第三条 在公司董事会增设期权管理委员会，由公司董事、监事及股东代表组成，委员会主任由董事长兼任，负责对公司从事期权投资业务进行监督管理。

Article 3 An option Management Committee shall be set up on the board of directors of a company, consisting of directors, supervisors and representatives of shareholders. The chairman of the board of directors shall concurrently be responsible for supervising and managing the company's options investment business.

第四条 在公司内新增设立期权业务部，部门领导经期权管理委员会批准后任命，主要负责投资机划和投资目标的制定，负责投资行为的执行，每季度向期权管理委员会提交期权投资业务报告。

Article 4 An option business department is newly established in the company. The department leaders are appointed after approval by the Option Management Committee. They are mainly responsible for the formulation of investment plans and investment objectives, the execution of investment actions and the submission of the option investment business report to the Option Management Committee quarterly.

第五条 公司总部新增设立合规经理，由公司期权管理委员会批准后任命，负责期权投资业务的日常风险控制和监督工作，定期或不定期对期权业务进行检查，每季末向期权管理委员会提交检查报告。

Article 5 A new compliance manager shall be appointed at the headquarters of the company after approval by the company's Options Management Committee. He shall be responsible for the daily risk control and supervision of the option investment business. He shall regularly or irregularly inspect the option business and submit an inspection report to the Options Management Committee at the end of each quarter.

三 操作计划的制定和业务流程

Formulation of Three Operational Plans and Business Processes

第六条 公司期权管理委员会根据公司整体的经营目标，确定公司期权投资的总体目标，并根据总体目标制定季度的投资目标。

Article 6 The company's options Management Committee shall determine the overall objectives of the company's options investment according to the company's overall operating objectives, and formulate quarterly investment objectives in accordance with the overall objectives.

第七条 期权业务部根据公司期权管理委员会的季度投资目标，结合市场现实情况，制定具体的实施计划，计划应列明以下事项：

Article 7 The Options Business Department shall formulate specific implementation plans in accordance with the quarterly investment objectives of the Company Options Management Committee and in light of market realities. The plans shall include the following items:

1. 拟参与期权交易的数量、时间分布、计划成本价格等。

Quantity, time distribution, planned cost and price of options to be traded.

1. 预计需要的保证金余额以及可能需要追加的保证金数量。

The expected margin balance and the amount of additional margin that may be required.

1. 预计实现的利润目标以及风险控制的手段。

The expected profit target and the means of risk control.

第八条 期权业务部负责在已经批准的操作计划内的期权交易

Article 8 The Options Business Department is responsible for the option trading within the approved operational plan.

的具体实施。

Specific implementation.

1. 期权业务部经理负责在已经批准的操作计划内向交易人员下达交易指令；

The manager of option business department is responsible for issuing trading instructions to traders within the approved operational plan.

1. 交易人员应检查指令是否符合具体的操作计划，若符合则执行，并及时向期权业务部经理恢复指令下达情况。

Traders should check whether the instructions conform to the specific operation plan and execute them if they conform, and timely restore the instructions to the manager of option business.

1. 成交确认后，交易人员应立即填写交易明细表，包括交易时间、交易价格、交易量等内容，并同时递交给合规经理、财务部。

After the confirmation of the transaction, the trader shall fill in the detailed transaction form immediately, including the transaction time, transaction price, transaction volume and so on, and submit it it to the compliance manager and the finance department at the same time.

1. 合规经理根据交易明细审查交易是否在经审批的操作计划内，交易人员是否有越权及错单行为，发现问题及时汇报，如审核无误，则在交易明显表签字后交给财务人员。

Compliance manager reviews whether the transaction is in the approved operational plan according to the transaction details, whether the trader has exceeded his authority and mistaken orders, and reports the problems in time. If the audit is correct, he will sign the transaction form and hand it to the financial officer.

1. 财务人员应核查交易明细表是否与代理机构发来的成交确认是否一致，核查无误后，财务人员应向代理机构、合规经理和会计核算人员发送经被授权人签字的交易确认，并依据公司财务制度进行相应的资金收付。

Financial personnel shall verify whether the transaction details are in accordance with the transaction confirmation sent by the agency. After verification, the financial personnel shall send the transaction confirmation signed by the authorized person to the agency, the compliance manager and the accounting personnel, and collect and pay the corresponding funds in accordance with the company's financial system.

四 交易风险控制

Four Transaction Risk Control

第九条 合规经理应经常关注交易市场出现的重大不利变动，应及时通知交易部门调整交易方案，必要时强制交易人员采取平仓等手段降低风险。

Article 9 Compliance managers should always pay attention to major adverse changes in the trading market, notify the trading department in time to adjust the trading scheme, and force traders to take measures such as closing positions when necessary to reduce risks.

第十条 合规经理应市场关注交易账户的资金情况，在出现保证金重大损失时要及时协调交易人员和财务人员，提前做好资金上的安排和准备。

Article 10 Compliance managers should pay attention to the capital situation of trading accounts in the market, coordinate the traders and financial personnel in time when there is a serious loss of margin, and make good arrangements and preparations for capital in advance.