

## **GFXC Request for Feedback – October 2024**

Amendments to the FX Global Code and Disclosure Cover Sheets

*Annex B: GFXC Proposed changes to the Liquidity Provider Disclosure Cover Sheet (2024)*

This document describes the proposed modifications to the Liquidity Provider Disclosure Cover Sheet as part of the Three-Year Review of the FX Global Code. Participants in the public consultation process are expected to provide their comments on this document.

## Liquidity Provider Disclosure Cover Sheet

The objective of the changes in red is to further improve the transparency and comparability of current data sharing practices via Disclosure Cover Sheets.

### FX Global Code

### Liquidity Provider Disclosure Cover Sheet

#### A. INSTRUCTIONS:

All Liquidity Providers should complete this Cover Sheet in relation to their wholesale foreign exchange market making activities. Liquidity Providers can make use of the FAQs and the “Liquidity Provider Disclosure Cover Sheet Instructions” available on the GFXC website to facilitate the completion of this Cover Sheet ([Disclosure Cover Sheets \(globalfx.org\)](https://www.globalfx.org/docs/disclosure-cover-sheets)). All terms used in this Cover Sheet are as defined in the FX Global Code unless otherwise stated ([https://www.globalfx.org/docs/fx\\_global.pdf](https://www.globalfx.org/docs/fx_global.pdf)).

#### B. SCOPE:

Liquidity Provider / Entity Name: -

Most Recent Date Completed: \_\_\_\_\_

Liquidity Provider to confirm the entity / business area(s) to which this Cover Sheet applies:

#### C. KEY DISCLOSURES:

##### 1. Capacity (Principle 8)

I. Liquidity Provider acts as (check one):

- Agent
- Principal
- Both

II. If ‘Both’, briefly describe when Liquidity Provider acts in each capacity:

*Add brief, clarifying commentary*

III. Liquidity Provider’s disclosure regarding capacity is located here:

*Add link + page reference/number*

2. Client interaction data (Principle 9)

- I. Liquidity Provider shares for commercial purposes any Client interaction data, i.e., data derived from client interactions related to an FX order or transaction, that is not anonymized and aggregated, with third parties (other than with explicit client consent or in accordance with Principle 20 which includes as required under applicable law or as otherwise requested by a relevant regulatory or public authority) for commercial purposes.

Yes

No

*Clarifying information, if needed.*

If yes:

- I.a. Liquidity provider shares client interaction data in real time with third parties.

Yes

No

*Clarifying information, if needed.*

- I.b. Liquidity provider provides client interaction data to a third party as a paid service?

Yes

No

*Clarifying information, if needed.*

- I.c. Are there restrictions on the third party's usage of data generated by client interactions?

Yes

No

*Clarifying information, if needed.*

- I.d. Clients can opt out of making their data available to third parties.

Yes

No

*Clarifying information, if needed.*

II. Data sharing disclosure is located here:

*Add link + page reference/number*

3. Pre-Hedging (Principle 11)

I. Liquidity Provider ever pre-hedges (check one):

- Yes
- No

II. If yes, Liquidity Provider ever offers clients, upon request, the option of placing an individual order specifying no pre-hedging (check one):

- Yes
- No

III. Liquidity Provider's disclosure regarding pre-hedging is located here:

*Add link + page reference/number*

4. Last Look (Principle 17)

I. Liquidity Provider ever employs Last Look (as defined in the FX Global Code) (check one):

- Yes
- No

II. Liquidity Provider's use of Last Look is (check all that apply):

- Symmetrical
- Asymmetrical

If Asymmetrical is used, briefly describe the circumstances:

*Add brief, clarifying commentary*

III. Liquidity Provider's Last Look window maximum and minimum length (in m/s)

*e.g. Maximum Last Look window time 25 m/s; Minimum Last Look window time 0 m/s*

Liquidity Provider may briefly describe the circumstances under which Last Look window times may change

*Add brief, clarifying commentary*

- IV. Liquidity Provider ever trades during the Last Look window:
- No
  - When sourcing liquidity under a “Cover and Deal” arrangement that meets all of the characteristics set out in Principle 17 of the Code.

- V. Liquidity Provider’s disclosure regarding Last Look is located here:

*Add link + page reference/number*

- VI. Liquidity Provider may include free form text regarding any of the above Last Look key topics, if it would like to highlight anything referenced in the main body of its disclosure attached

*Add any additional information re Last Look*

## D. DISCLOSURES INDEX:

### Order Handling

#### Order Aggregation (Principle 9)

- I. Liquidity Provider’s disclosure regarding order aggregation is located here:

*Add link + page reference/number*

#### Discretion (Principle 9)

- I. Liquidity Provider’s disclosure regarding use of discretion is located here:

*Add link + page reference/number*

Time-Stamping (Principle 9)

- I. Liquidity Provider's disclosure regarding time-stamping is located here:

*Add link + page reference/number*

Stop-Loss Orders (Principle 10)

- I. Liquidity Provider's disclosure regarding stop-loss orders is located here:

*Add link + page reference/number*

Partial Fills (Principle 10)

- I. Liquidity Provider's disclosure regarding use of partial fills is located here:

*Add link + page reference/number*

Additional Disclosures

Use of Reference Prices (Principle 13)

- I. Liquidity Provider's disclosure regarding use of reference prices is located here:

*Add link + page reference/number*

Markup / Fair Pricing Standards (Principle 14)

- I. Liquidity Provider's disclosure regarding use of mark-up is located here:

*Add link + page reference/number*

Aggregation Services (Principle 18)

- I. Liquidity Provider uses aggregation services:

Yes

No

- II. If 'Yes', Liquidity Provider's disclosure describing its aggregation services is located here:

*Add link + page reference/number*

- III. Liquidity Provider's disclosure regarding use of liquidity sources is located here:

*Add link + page reference/number*

## GLOBAL FOREIGN EXCHANGE COMMITTEE

Internal sharing of Confidential FX Trading Information (Principle 19)

- I. Liquidity Provider's high level disclosure regarding internal sharing of confidential FX Trading Information is located here:

*Add link + page reference/number*

Market Colour (Principles 20 and 22)

- I. Liquidity Provider's disclosure regarding use of Market Colour is located here:

*Add link + page reference/number*

Do you agree with the added section on the Liquidity Providers Disclosure Cover Sheet, which would map to Principle 9? If not, why not? Please elaborate.