

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-sheet-instructions.pdf)). 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).

B. SCOPE:

Liquidity Provider / Entity Name: United Overseas Bank Limited
Most Recent Date Completed: 15 October 2025

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

UOB Ltd's (acting through its various branches and affiliates) role in the Wholesale Foreign Exchange Markets

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:

N/A

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

[FOREIGN EXCHANGE TRANSACTIONS – TRADING PRACTICES AND INFORMATION](#)
Page 1 – UOB's Role/ Principal Trading

2. Client interaction data (Principle 9)

- I. Liquidity provider shares Client interaction data i.e. data derived from client interactions related to an FX order or transaction, that is not anonymized and not aggregated, with third parties (other than with explicit client consent or in accordance with Principle 20 which includes data shared with third parties such as regulatory or public authorities).

☐ Yes

☒ No

N/A

- Ia. Liquidity provider shares Client interaction data in real time with third parties.

☐ Yes

☒ No

N/A

- Ib. Liquidity provider provides Client interaction data to a third party as a paid service?

☐ Yes

☒ No

N/A

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

☐ Yes

☒ No

N/A

- II. Data sharing disclosure is located here:

N/A

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:

[FOREIGN EXCHANGE TRANSACTIONS – TRADING PRACTICES AND INFORMATION](#)
Page 2 – Market Making/ Pricing (Last 2 Paragraphs)

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:

[FOREIGN EXCHANGE TRANSACTIONS – TRADING PRACTICES AND INFORMATION](#)
Page 4 – Approach to Last Look (1st Paragraph)

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

[FOREIGN EXCHANGE TRANSACTIONS – TRADING PRACTICES AND INFORMATION](#)
Page 4 – Approach to Last Look (2nd Paragraph)

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

[FOREIGN EXCHANGE TRANSACTIONS – TRADING PRACTICES AND INFORMATION](#)
Page 5 – Approach to Last Look (3rd Paragraph)

- 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:
- [FOREIGN EXCHANGE TRANSACTIONS – TRADING PRACTICES AND INFORMATION](#)
Page 3 to 5 – Section F Last Look
- 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
- N/A

D. DISCLOSURES INDEX

Order Handling

Order Aggregation (Principle 9)

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

[FOREIGN EXCHANGE TRANSACTIONS – TRADING PRACTICES AND INFORMATION](#)
Page 2 – Market Making/ Pricing (1st Paragraph)

Discretion (Principle 9)

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

[FOREIGN EXCHANGE TRANSACTIONS – TRADING PRACTICES AND INFORMATION](#)
Page 2 – Market Making/ Pricing (1st and 2nd Paragraph)

Time-Stamping (Principle 9)

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

[FOREIGN EXCHANGE TRANSACTIONS – TRADING PRACTICES AND INFORMATION](#)
Page 3 – Handling of Orders (Last Paragraph)

Stop-Loss Orders (Principle 10)

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

[FOREIGN EXCHANGE TRANSACTIONS – TRADING PRACTICES AND INFORMATION](#)
Page 3 – C. “Stop-loss” Orders

Partial Fills (Principle 10)

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

[FOREIGN EXCHANGE TRANSACTIONS – TRADING PRACTICES AND INFORMATION](#)
Page 2 – Market Making / Pricing (2nd Paragraph)

Additional Disclosures

Use of Reference Prices (Principle 13)

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

The UOB Price is derived from external and internal reference data and prices. Such data and prices may incorporate the following:

- Top of book prices available on other trading/execution venues
- Depth of liquidity data available on other trading/execution venues
- Last traded price data available on internal or other trading/execution venues
- Last traded price data (both internal and external) on other market instruments

Any firm or indicative price or spread quoted by UOB is an "all-in" price inclusive of any sales and trading mark-ups over the price at which UOB traded or may have been able to trade with other Counterparties, regardless of the circumstances under which a Counterparty may receive or overhear a price. Counterparties may receive different prices of transactions that are the same or similar because UOB's "all-in" prices and spreads are tailored to each Counterparty individually, and are based on a wide range of standard commercial factors, including but not limited to Counterparties' trading histories, sizes of trades, market conditions and UOB's own costs and transactions.

UOB is not obligated to disclose the components of its all-in price or the amount of revenue that it is expected to earn on any particular FX transaction.

Markup / Fair Pricing Standards (Principle 14)

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

[FOREIGN EXCHANGE TRANSACTIONS – TRADING PRACTICES AND INFORMATION](#)
Page 2 – Market Making / Pricing (3rd Paragraph)

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:

N/A

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

N/A

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:

[FOREIGN EXCHANGE TRANSACTIONS – TRADING PRACTICES AND INFORMATION](#)
Page 5 – Information Handling (1st and 2nd Paragraph)

Market Colour (Principles 20 and 22)

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

[FOREIGN EXCHANGE TRANSACTIONS – TRADING PRACTICES AND INFORMATION](#)
Page 5 – Information Handling (1st Paragraph)