



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).

B. SCOPE:

Liquidity Provider / Entity Name: NatWest Markets Plc and NatWest Markets N.V.

Most Recent Date Completed: December 2021

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

NatWest Markets Plc and NatWest Markets N.V.

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:

See page 1 of our [General Sales and Trading Disclosure](#) under "Principal Trading".

2. 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:

See page 4 of our [General Sales and Trading Disclosure](#) under "Hedging and Pre-hedging". We do not pre-hedge as a default, but may do so in line with our disclosure and internal policies.

3. 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:

Except as described below, we apply symmetrical price tolerance to our FX trading.

We may apply asymmetrical price tolerance if requested by the client. In addition, for some modes of connection, we are unable to offer symmetrical price tolerance due to technology limitations.

Further information regarding our use of price tolerance is set out in our [FX E-Trading Disclosure](#). This also explains how we use price improvement to adjust FX rates applied to certain transactions for the benefit of the client.

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

Based on a review of FX transactions entered into in the 12 month period prior to the date of this Coversheet across NatWest Markets Plc and NatWest Markets N.V. for which last look was applied, the typical last look window depending on transaction type is as follows:

Product	Minimum	Median	Maximum – large majority of transactions
Spot FX transactions	1ms	8ms	28ms
FX forwards, including FX time options and the forward element of FX swaps	2ms	15ms	257ms
FX options	223ms	517ms	1240ms

Note that figures are approximate and to avoid outliers skewing the results, the "Maximum" figure shown is a period that is equal to or greater than the last look window applicable to 90% of transactions measured. Further information on this topic is set out in our [FX E-Trading Disclosure](#).

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

Factors which may impact the duration of the last look window for any transaction include, without limitation, whether any enforced hold time is applied to a transaction, the duration of credit checks, system latency and geographical location of available liquidity used to price the transaction.

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:

See our [FX E-Trading Disclosure](#).

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

Section 5 of Part A of our [FX E-Trading Disclosure](#) explains how we use “Cover and Deal” arrangements in limited circumstances. Such arrangements involve us using a liquidity provider’s price in the price we distribute to our client in order to improve the price that we are able to offer. Our disclosure provides more detail on the criteria we use to select liquidity providers to support this solution.

D. DISCLOSURES INDEX:

Order Handling

Order Aggregation (Principle 9)

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

See page 2 of our [General Sales and Trading Disclosure](#) under “Market Maker”.

Discretion (Principle 9)

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

See page 2 of our [General Sales and Trading Disclosure](#) under "Client Orders".

Time-Stamping (Principle 9)

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

See page 2 of our [General Sales and Trading Disclosure](#) under "Client Orders".

Stop-Loss Orders (Principle 10)

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

See page 1 of our [General Sales and Trading Disclosure](#) under "Market Maker".

Partial Fills (Principle 10)

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

See page 2 of our [General Sales and Trading Disclosure](#) under "Client Orders".

Additional Disclosures

Use of Reference Prices (Principle 13)

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

See page 4 of our [General Sales and Trading Disclosure](#) under "Pricing".

Markup / Fair Pricing Standards (Principle 14)

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

See page 3 of our [General Sales and Trading Disclosure](#) under "Pricing".

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:

See page 3 of our [General Sales and Trading Disclosure](#) under "Electronic Trading; Use of Algorithms; Aggregation".

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

See page 3 of our [General Sales and Trading Disclosure](#) under "Electronic Trading; Use of Algorithms; Aggregation".

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:

See page 4 of our [General Sales and Trading Disclosure](#) under "Client and NatWest Markets Information".

Market Colour (Principle 20)

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

See page 4 of our [General Sales and Trading Disclosure](#) under "Client and NatWest Markets Information".

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