

**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 \(globalfxc.org\)](http://Disclosure Cover Sheets (globalfxc.org))). All terms used in this Cover Sheet are as defined in the FX Global Code unless otherwise stated ([https://www.globalfxc.org/docs/fx\\_global.pdf](https://www.globalfxc.org/docs/fx_global.pdf)).

## **B. SCOPE:**

**Liquidity Provider / Entity Name:** Sumitomo Mitsui Banking Corporation, New York Branch

**Most Recent Date Completed:** January 26, 2026

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

This Disclosure Cover Sheet applies to FX transactions engaged in by Sumitomo Mitsui Banking Corporation, New York Branch (“SMBC NY”).

## **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:

2. Roles and capacities of SMBC NY: Acting as principal

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### **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:

7. Hedging and Pre-hedging

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#### 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:

N/A

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

8. Electronic Trading Platform

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

N/A

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:

8. Electronic Trading Platform

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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:

6. Order Handling

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#### Discretion (Principle 9)

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

6. Order Handling

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#### Time-Stamping (Principle 9)

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

8. Electronic Trading Platform

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#### Stop-Loss Orders (Principle 10)

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

6. Order Handling

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#### Partial Fills (Principle 10)

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

6. Order Handling

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## Additional Disclosures

### Use of Reference Prices (Principle 13)

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

N/A

### Markup / Fair Pricing Standards (Principle 14)

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

4. Pricing

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### 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:

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

6. Order Handling

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### 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:

9. Confidentiality

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Market Colour (Principles 20 and 22)

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

9. Confidentiality

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