

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:

Commonwealth Bank of Australia

LEI - MSFSBD3QN1GSN7Q6C537

Most Recent Date Completed: 7/03/2022

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

Global Markets FX Sales and Trading

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:

<https://www.commbank.com.au/content/dam/commbank-assets/about-us/docs/global-markets-sales-and-trading-practices.pdf> refer to page 1.

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:

<https://www.commbank.com.au/content/dam/commbank-assets/about-us/docs/global-markets-sales-and-trading-practices.pdf> refer to page 2.

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:

N/A.

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

Minimum length 20m/s, maximum length 350m/s.

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

Last Look window is not configurable. The change in time is due to credit check request and response along with network related latency.

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:

<https://www.commbank.com.au/content/dam/commbank-assets/about-us/docs/global-markets-sales-and-trading-practices.pdf> refer to page 3.

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:

<https://www.commbank.com.au/content/dam/commbank-assets/about-us/docs/global-markets-sales-and-trading-practices.pdf> refer to page(s) 1-2

<https://www.commbank.com.au/content/dam/commbank/assets/about/opportunity-initiatives/fx-order-execution-handling-client-disclosure.pdf>

Discretion (Principle 9)

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

<https://www.commbank.com.au/content/dam/commbank-assets/about-us/docs/global-markets-sales-and-trading-practices.pdf> refer to page(s) 1-2

<https://www.commbank.com.au/content/dam/commbank/assets/about/opportunity-initiatives/fx-order-execution-handling-client-disclosure.pdf>

Time-Stamping (Principle 9)

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

No disclosure. CBA timestamps both when an electronic order is accepted and executed in order to create an effective audit trail and to provide transparency to clients where appropriate.

Stop-Loss Orders (Principle 10)

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

<https://www.commbank.com.au/content/dam/commbank/assets/about/opportunity-initiatives/fx-order-execution-handling-client-disclosure.pdf> refer to page 4.

Partial Fills (Principle 10)

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

<https://www.commbank.com.au/content/dam/commbank/assets/about/opportunity-initiatives/fx-order-execution-handling-client-disclosure.pdf> refer to page 3.

Additional Disclosures

Use of Reference Prices (Principle 13)

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

No disclosure specific for reference prices. Benchmark Fix principles contained in
<https://www.commbank.com.au/content/dam/commbank/assets/about/opportunity-initiatives/fx-order-execution-handling-client-disclosure.pdf> refer to page 3.

Markup / Fair Pricing Standards (Principle 14)

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

<https://www.commbank.com.au/content/dam/commbank/assets/about/opportunity-initiatives/fx-cost-of-service-client-disclosure.pdf>

<https://www.commbank.com.au/content/dam/commbank-assets/about-us/docs/global-markets-sales-and-trading-practices.pdf> refer to page 3.

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:

<https://www.commbank.com.au/content/dam/commbank-assets/about-us/docs/global-markets-sales-and-trading-practices.pdf> refer to page 4.

Market Colour (Principles 20 and 22)

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

<https://www.commbank.com.au/content/dam/commbank-assets/about-us/docs/global-markets-sales-and-trading-practices.pdf> refer to page 4.