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)). 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).

B. SCOPE:

Liquidity Provider / Entity Name: **Intesa Sanpaolo S.p.A.**
Most Recent Date Completed: **Last date (6/3/2023)**

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

Intesa Sanpaolo S.p.A.

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:

> *Ref. Nota Informativa Modalità di Trattazione degli Ordini Forex (capitolo 2. Market Making)*

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:

> *Ref. Nota Informativa Modalità di Trattazione degli Ordini Forex (capitolo 5. Pre - Hedging)*

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)

> *n/a*

    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:

> *Ref. Nota Informativa Modalità di Trattazione degli Ordini Forex (capitolo 6. 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:

> *Ref. Nota Informativa Modalità di Trattazione degli Ordini Forex (capitolo 3. Order Execution)*

Discretion (Principle 9)

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

> *Ref. Nota Informativa Modalità di Trattazione degli Ordini Forex (capitolo 3. Order Execution)*

Time-Stamping (Principle 9)

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

> *Ref. Nota Informativa Modalità di Trattazione degli Ordini Forex (capitolo 3.4 Time Stamping Ordini)*

Stop-Loss Orders (Principle 10)

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

> *Ref. Nota Informativa Modalità di Trattazione degli Ordini Forex (capitolo 3.2 Resting orders ("Take Profit" & "Stop Loss"))*

Partial Fills (Principle 10)

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

> *Ref. Nota Informativa Modalità di Trattazione degli Ordini Forex (capitolo 3. Order Execution)*

Additional Disclosures

Use of Reference Prices (Principle 13)

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

> *Ref. Nota Informativa Modalità di Trattazione degli Ordini Forex (capitolo 3.2 Resting orders ("Take Profit" & "Stop Loss"); 3.3 Ordini al Fixing)*

Markup / Fair Pricing Standards (Principle 14)

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

> *Ref. Nota Informativa Modalità di Trattazione degli Ordini Forex (capitolo 4. 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:

> *n/a*

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

> *Ref. Nota Informativa Modalità di Trattazione degli Ordini Forex (capitolo 7. FX Algorithmic execution & aggregation services)*

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:

> *Ref. Nota Informativa Modalità di Trattazione degli Ordini Forex (capitolo 8. Trattamento delle Informazioni)*

Market Colour (Principles 20 and 22)

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

> *Ref. Nota Informativa Modalità di Trattazione degli Ordini Forex (capitolo 8. Trattamento delle Informazioni)*