

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)). 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: Morgan Stanley

Most Recent Date Completed: December 2021

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

Morgan Stanley Institutional Securities Group’s Fixed Income Division

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 “Overview” on p. 1-2 of our [FID Disclosure Letter](#)

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 “Principal Trading & Market Making” on p. 2-3 of our [FID Disclosure Letter](#)

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):

Our current Last Look minimum window is zero and the typical upper bound of our window is 10 milliseconds.

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

Our maximum Last Look window length may change due to unforeseen technological events

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 "Annex B, Electronic Quote-Based Trading" on p. 9-10 of our [FID Disclosure Letter](#)

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

We apply "last look" trade acceptance parameters "symmetrically," i.e., if the price move, regardless of direction, is greater than a specified threshold, your trade request will be rejected. You may request to opt-out of this symmetrical application and receive asymmetric application of these parameters, which may increase your overall trade acceptance rate and narrow the spread of quotes provided to you.

We do not use an "additional hold time" (as such term is defined in the U.K. Financial Conduct Authority's recognition of the revised FX Global Code and the Global Precious Metals Code dated 19 November 2021) in our electronic foreign exchange quote streaming.

D. DISCLOSURES INDEX:

4. Order Handling

Order Aggregation (Principle 9)

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

See "Liquidity Sourcing" on p. 3-5 of our [FID Disclosure Letter](#)

Discretion (Principle 9)

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

See "Principal Trading & Market-Making" and "Liquidity Sourcing Trading" on p. 2-5 of our [FID Disclosure Letter](#)

Time-Stamping (Principle 9)

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

See 2nd paragraph of Annex B on p.9 of our [FID Disclosure Letter](#)

Stop-Loss Orders (Principle 10)

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

See 2nd paragraph of "Principal Trading & Market-Making" and 3rd paragraph of "Liquidity Sourcing" on pages 3 and 4, respectively, of our [FID Disclosure Letter](#)

Partial Fills (Principle 10)

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

See 3rd paragraph of "Liquidity Sourcing" on p.4 of our [FID Disclosure Letter](#)

Additional Disclosures

Use of Reference Prices (Principle 13)

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

Where a reference price is used in a transaction or order, Morgan Stanley discloses how such reference price is established in connection with either the execution of such trade or receipt of such order (as applicable). In addition, selection of such reference price will depend on the currency pair and available pricing source(s).

Markup / Fair Pricing Standards (Principle 14)

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

See 1st paragraph of "Liquidity Sourcing" on p.3-4 and Annex A on p.8 of our [FID Disclosure Letter](#)

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:

See "Liquidity Sourcing" on p.3-5 and Annex B, "Electronic Order Based Trading" on p. 10-11 of our [FID Disclosure Letter](#)

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 1st and 2nd paragraphs of "Client Information" on p.5 of our [FID Disclosure Letter](#)

Market Colour (Principle 20)

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

See 3rd and 4th paragraphs of "Client Information" on p.5-6 of our [FID Disclosure Letter](#)