

## Annex

**Figure 1: Summary of Key Issues in the Disclosure and Transparency Landscape**

<p><b>Content</b></p>		<ul style="list-style-type: none"> <li>- Some disclosures have room for enhancement in light of the guidance set out in the Code and other published GFXC materials. In particular, there is heightened focus on a small set of key topics – e.g. last look, pre-hedging, and agent vs principal – which have been identified as requiring the most attention.</li> </ul>
<p><b>Clarity</b></p>		<ul style="list-style-type: none"> <li>- Whilst there can be a role for compliance and Legal areas in holding the pen on disclosure documents, often being an effective conduit between different market areas, market participants can overly rely on Legal and compliance for producing disclosures with a lack of input from relevant business areas. This can, at times, lead to unhelpful use of legalese and a lack of “Plain English”.</li> <li>- Reject codes have developed as a way for Market Participants to inform their Clients on how orders have been handled and transacted. Reject codes can vary in detail and type from Market Participant to Market Participant, creating issues for Clients in comparing order handling across price makers. Increased guidance on the format and/or nature of reject codes have therefore been identified as an initiative that could improve clarity for Clients.</li> </ul>
<p><b>Accessibility</b></p>		<ul style="list-style-type: none"> <li>- Disclosures are not provided to Market Participants in a consistent manner and there is no repository/library of firms’ disclosures made readily available to all Market Participants.</li> <li>- Disclosures are inconsistent in their structure, making it difficult to identify within disclosure documents which Principles of the Code are being referred to, and for Market Participants to compare across different firms’ disclosures.</li> <li>- It is not clear what role platforms and prime brokerage providers can play in facilitating disclosures on anonymous trading venues.</li> </ul>
<p><b>Review</b></p>		<ul style="list-style-type: none"> <li>- Linked to accessibility there is no central repository outlining when disclosures have been reviewed or updated. This makes it challenging for Market Participants to keep an up to date record of disclosures from counterparties.</li> </ul>

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