



EUROPEAN CENTRAL BANK

EUROSYSTEM

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Global Code of Conduct: Request for feedback

Frankfurt, 11 July 2017

- Timing: by 21 September 2017 (in pdf format)
- Secretariat to collate answers and prepare discussion paper for meeting on 11-12 November
- GFXC to agree next steps and deliver by end 2017

Questions:

- Question 1 *As noted above, the Code states that “During the last look window, trading activity that utilises the information from the Client’s trade request, including any related hedging activity, is likely inconsistent with good market practice because it may signal to other Market Participants the Client’s trading intent, skewing market prices against the Client, which (1) is not likely to benefit the Client...” Do you agree or disagree? Are there specific situations where this trading activity benefits the Client? In those situations is such trading activity related to the validity or price checks that the Code states as the purpose for last look? Please provide reasons for each response.*
- Question 2 Based on your response to Question 1, do you consider that the language set out in the Code on this activity should be modified (for example, should it be strengthened further or provide further detail as to what may or may not constitute good practice)? Please provide reasons.