

Westpac's 'last look' disclosure for FX trade requests via multi dealer platforms and direct API

Effective from 11th December 2023.

Westpac Banking Corporation (**Westpac**, **we**, **us**, **our**) provides streamed indicative electronic FX rates to its customers (**you**, **your**) who trade with us via multi dealer platforms and direct API connections (the **Service**).

This document sets out important information in relation to what Westpac means by and how it uses 'last look' in the provision of the Service in respect of trade requests for spot FX, FX Forwards and FX swaps.

Notwithstanding anything set out below, Westpac reserves the right to cancel or reject a trade request in its sole discretion at any time.

What does Westpac mean by 'last look'?

Generally, when a liquidity provider receives a request to enter into a trade at a specified price (referred to herein as a **trade request**) it undertakes several pre-trade checks before either accepting or rejecting the trade request. One of these pre-trade checks is a *last look* at the price specified for the trade request.

Westpac's use of last look

Westpac utilises last look to protect against stale or incorrect prices and the risk of integrity failures. A trade request may be rejected if,

- the specified price is stale or has expired according to one of the following pre-determined execution thresholds:
 - A different price has already been streamed by Westpac and thereafter a latency threshold has expired (typically 500 milliseconds, but channel-dependent) (expired price);
 - The market price has substantially changed (determined in Westpac's discretion) between us sending the quote and receiving your trade request in respect of that quote (stale price).

For FX swaps, if it is a stale price, a net present value (NPV) staleness check will also be applied to the FX swap trade request. If the trade request passes this NPV staleness check the standard expiry check is overridden and we will accept the trade request;

Or,

 the specified price is different to the price streamed by Westpac or the trade request has a different quantity to the quantity for the price streamed by Westpac. Westpac accepts or rejects trade requests as soon as its pre-trade checks are completed.

Westpac does not:

- apply 'hold times' when utilising last look, meaning the specified price for a trade request is checked against streamed and market prices as at the time the trade request is received or,
- engage in hedging activity specific to a trade request or with any information from such trade request before the trade request is accepted.

Symmetric application of certain pre-trade checks

Westpac applies the stale price and expired price checks for spot FX, FX forward or FX swap trade requests symmetrically – this means (subject to the net present value check for FX swaps noted above) that if the relevant price change has exceeded pre-determined thresholds, regardless of whether the movement is against you (and in favour of Westpac) or against Westpac (and in favour of you), Westpac will reject the trade request.

Westpac will apply the stale price and expired price checks symmetrically on all customer trade requests referred to herein, unless you have requested and we have agreed in writing otherwise.

Further information

Further information on how Westpac applies last look, rejection rates and the symmetric or asymmetric application of certain checks is available on request from a Westpac sales representative.

Context of this disclosure

This disclosure should be read subject to the Electronic Trading User Agreement.

Updates.

We may modify the practices described in this disclosure from time to time, including due to changes in law or regulation or because of industry or other developments. Updates will be published at westpac.com.au/disclosure-documents/wpgc-bus-disclosure-docs/

Other Disclosures

You should review regulatory and other disclosures which are available at Terms and Conditions | Westpac

