



STATEMENT OF COMMITMENT TO THE FX GLOBAL CODE

Pershing LLC has reviewed the content of the FX Global Code ("Code") and acknowledges that the Code represents a set of principles generally recognized as good practice in the wholesale foreign exchange market ("FX Market"). Pershing LLC, confirms that it acts as a Market Participant as defined by the Code, and is committed to conducting its FX Market Activities ("Activities") in a manner consistent with the principles of the Code. To this end, Pershing LLC has taken appropriate steps, based on the size and complexity of its Activities, and the nature of its engagement in the FX Market, to align its Activities with the principles of the Code.

Pershing LLC

Signed:  5/24/18
Roy Kelly, Director of Foreign Exchange

Date: 24th May 2018