



Pre-Trade Mid-Market Mark Disclosure

As a provisionally registered swap dealer, State Street Bank and Trust Company ("State Street") is subject to swaps regulation by the Commodity Futures Trading Commission ("CFTC"). CFTC Regulation 23.431(a)(3)(i) requires disclosure by a swap dealer to any counterparty to a swap transaction (other than a swap dealer, major swap participant, security-based swap dealer, or major security-based swap participant) of the mid-market mark of the swap (or "pre-trade mid-market mark"), among other material disclosures. [CFTC Regulation 23.431(d) requires swap dealers to disclose a daily mark, which is also a mid-market mark provided daily during the term of the swap.]

State Street provides the following disclosures to you in accordance with the requirements set forth in the above regulations. Please note that State Street is not required to disclose pre-trade mid-market marks in certain transactions as appropriately covered by relevant CFTC no-action letters¹.

Pursuant to CFTC Regulation[s] 23.431(a)(3)(i) [and 23.431(d)], to the extent State Street provides you a two-way price (i.e., a bid and ask) with respect to a swap transaction, the mid-market mark, specifically in connection with a foreign exchange ("FX") transaction, is the midpoint between the bid and offer, or the calculated equivalent thereof at the time the two-way price is delivered.

A pre-trade mid-market mark does not include amounts for profit, credit reserve, hedging, funding, liquidity, or any other costs or adjustments. Thus, (a) the mid-market mark may not necessarily be a price at which we would agree to replace or terminate the swap; (b) it may not necessarily represent the value assigned to the relevant swap for the purpose of computing margin calls; and (c) the mid-market mark may not necessarily be the value of the relevant swap that is marked on the books and records of State Street.

¹ See CFTC Letter No. 13-12 "Relief for Swap Dealers and Major Swap Participants Regarding the Obligation to Provide Certain Disclosures for Certain Transactions Under Regulation 23.431." Also, CFTC Letter No. 12-58 "Request for Relief Regarding Obligation to Provide Pre-Trade Mid-Market Mark for Certain Credit Default Swaps and Interest Rate Swaps."

Finally, we make no representations or warranties to you that the prices at which we offer or value FX transactions are the best prices available in the marketplace. You may wish to seek representative quotation from other participants in the relevant market to compare prices or to determine the intrinsic or current market value of a particular swap.