



FMSB
 Statement of Good Practice
 Front Office Supervision of
 Wholesale Traded Markets

Transparency Draft
 FSB invites comments on this Statement of Good Practice for
 22 October 2023. Please address any comments or requests to
 feedback@fmsb.com



FMSB
 Statement of Good Practice
 Governance of sustainability-
 linked products

Transparency Draft
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 feedback@fmsb.com



INSURING TREASURY BEST PRACTICE: THE ROLE OF PRODUCT
 Senior Manager, Sterling Markets, Bank of England
 Founder, Dukes & King
 General Counsel, Financial Markets Standards Board
 James Winterton, Associate Director – Policy & Technical,
 Corporate Treasurers

Pre-hedging: case studies
 Spotlight Review
 July 2024



A year of gathering momentum



FMSB
 Standard for
 Client Onboarding
 Documentation and Processes

FINAL



FMSB
 Statement of Good Practice
 for the application of a model
 risk management framework to
 electronic trading algorithms



Annual Report 2024

Our purpose

We seek to support well-functioning, trusted, global wholesale financial markets that in turn support sustainable economic growth for governments, corporations and investors.

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FMSB at a Glance

Who are we?

FMSB is an industry-led, member-funded, not-for-profit, global standards body for the wholesale financial markets.

Our Members represent all parts of the wholesale financial industry: banks, investment institutions, infrastructure and data services providers, corporates, pension funds and interdealer brokers. Collectively, they account for a significant proportion of the global wholesale financial market.

Why we are here

In 2015, the UK Fair and Effective Markets Review recommended the formation of a practitioner-led standards body dedicated to improving the fairness and effectiveness of wholesale financial markets in fixed income, currencies and commodities (FICC).

FMSB was tasked with addressing the gaps between regulation and actual market practices, to agree standards of good practice, drive adherence, and ultimately, to eliminate the bad behaviours that existing rules had occasionally failed to prevent.

With the encouragement of its Members, FMSB's remit has evolved over time beyond its original FICC front office focus to cover other asset classes and areas of strategic importance to the wholesale financial markets, including post-trade.

What we do

Raising standards across our industry means addressing topical issues, at the right time, in the right way. It also requires agreed standards to be widely adopted and embedded into our industry's ways of working. FMSB's approach to standard setting and driving adherence to standards reflects this ambition. More detail on how we raise standards can be found on the next page.

How are we set up?



Raising Standards across our Industry

FMSB’s approach to standard setting is based on four key objectives:

1
Identify global market vulnerabilities

In a rapidly evolving industry, a structured approach to horizon scanning ensures that emerging trends and threats are identified and that FMSB can respond in a timely and effective way to the risks that matter most to our Members and to the markets as a whole.

2
Develop best practice

FMSB produces a range of different publications, according to the nature of the issue and the needs of our Members.

- **FMSB Standards:** standards of market practice that Members are formally committed to adhere to.
- **Statements of Good Practice (SoGP):** reflecting FMSB’s view of what constitutes best practice in a particular area. Members are expected to review and adapt their own market practices to align with relevant SoGPs although there is no formal adherence requirement.
- **Spotlight Reviews:** focused on important emerging issues, drawing on the insight of Members and industry experts to highlight new challenges for the market and inform topics for future work.

3
Drive adherence to standards

FMSB Members complete an annual Statement of Commitment that attests to their adherence to FMSB Standards and confirms that they have the necessary internal policies, procedures and controls in place to underpin their commitment.

In addition, our Members draw on FMSB’s SoGP’s and Spotlight Reviews to further raise standards of market practice within their firms.

All FMSB publications are published on our website and non-member firms are encouraged to consider and adopt them where relevant.

4
Promote international convergence

Wholesale financial markets are global in nature. By bringing together major global firms, engaging with regulators in multiple jurisdictions, and participating in major international bodies and initiatives, FMSB is a powerful influence in driving international convergence of best practice and market standards.

Delivering Value

FMSB's business model is unique in ways that create real value for its Members and for the broader industry.

1

Practitioner led

FMSB's Members represent all sections of the wholesale financial markets – sell-side; buy-side; infrastructure providers; corporates; pension funds; data service providers, interdealer brokers. They are directly involved in shaping FMSB's activities, including the identification and prioritisation of vulnerabilities, content delivery, and final sign-off of all publications. They take responsibility for driving best practice into their own operations and play an important role in encouraging similar discipline across the industry.

2

Independent but with close relationships with regulators

FMSB is a wholly independent, not-for-profit organisation with a Board made up of seven non-executive directors and the CEO, also a director. It is fully funded by its Members through annual membership subscriptions. The Advisory Council of Members supports the FMSB Limited Board in setting its strategy and assesses its performance. The Standards Board of Members sets the plan of work by ratifying topics proposed by the respective committees.

Although independent, FMSB has developed close relationships with global regulators, offering significant benefits for both sides. FMSB does not engage in lobbying activities that might otherwise compromise its unique convening role with both regulators and firms.

3

Internationally relevant standards backed by an adherence mechanism

FMSB's Member-driven work programme coupled with strong, international regulatory engagement ensures that its Standards have broad relevance and acceptance across the industry. Mandatory adherence for Members means that these Standards have real practical significance for the way that business is conducted in large parts of the industry and counterparties can have greater confidence in dealing with member organisations that hold to them.

4

Agile and cost effective

FMSB operates with a small central team and a modest budget. Nevertheless, it can support an extensive and continually evolving work programme thanks to the expert resources made available by its Members. This combination of flexible resources and a practical approach means that FMSB can respond quickly to Members' needs.

Built on Shared Values

How we work together

As set out in the Fair and Effective Markets Review (FEMR) our Members are “senior business leaders with extensive experience of FICC markets, who represent their own views rather than those of their firms.” They are drawn from firms across the wholesale financial markets, each with its own business priorities and distinctive organisational culture. Nevertheless, they share a common mindset critical to the success of FMSB.

A commitment to raising standards across the industry

Our Members are united in their resolve to drive out bad behaviours and poor practices in wholesale markets that are disruptive and serve to undermine confidence.



Openness and transparency

The quality of the discussions within FMSB’s Committees and Working Groups, which are observed by an external legal counsel, depends on the willingness of Members to share experiences and express opinions without reticence or hidden agendas.



A collaborative approach

FMSB and its Members operate in a collegiate manner drawing on the expertise of each other as well as other market participants, regulators and subject matter experts



From our Chair



Jonathan
Moulds
Chair

In a year of global political and regulatory change, FMSB Members continued to work steadfastly together towards our collective aim of driving fair and effective wholesale markets.

2025 is a milestone year for us, as it marks the anniversary of the Fair and Effective Markets Review, which led to FMSB's establishment. Markets clearly continue to present complex new challenges - among them market-facing applications of AI, the move towards T+1 and increasing cross-border regulatory complexity - all of which necessitate industry collaboration on a global scale. From its origins in FEMR, FMSB has developed into a valuable and trusted forum across the world for bringing together senior industry expertise to address the gaps between regulation and actual market practices.

In market terms, 2024 was characterised by sluggish growth and continued volatility, with some recovery towards the end of year. Geopolitical instability amid continuing conflicts in the Middle East and Ukraine, as well as major elections around the world, impacted risk appetite and this looks set to continue as the impact of the new US Government in particular plays out.

As UK Government pushes to further develop UK capital markets and support economic growth it is more important than ever that these markets are an attractive, efficient place to do business, as well as a disciplined one.

FMSB is already playing a key role here in terms of contributing to how we get ready for the transition to T+1 with our Standard on the Sharing of Standard Settlement Instructions (SSIs). Meanwhile our work on pre-hedging has been welcomed and referenced globally by regulators.

Having now served well over a full year as FMSB Chair I have now seen how much work goes into FMSB's output over the course of 12 months, from horizon-scanning to identify new topics, to developing, drafting, agreeing and consulting externally on our publications. I salute all those who have been involved in what has been a strong year for us, with two Standards, three Statements of Good Practice (including two published as Transparency Drafts) and a Spotlight Review issued during the year.

Of course, the impact of FMSB's work depends on it being widely adopted, so I am also pleased that it has been a positive year in terms of the continuing expansion of our membership, with Moody's Corporation, the Toronto-Dominion Bank and Encompass Corporation joining us in 2024. We now represent 50 plus Members who have a footprint across Europe, North America, Asia and Australia.

From our Chair continued



51

FMSB Members



490+

Financial market experts



40

Final FMSB Standards, Statements of Good Practice and Spotlight Reviews published

All as at 31 December 2024

Our work is appreciated globally by firms and regulators alike and in May we were welcomed as an Affiliate Member of the International Organisation of Securities Commissions (IOSCO) furthering our collaboration on international standard setting. We also extended our existing Consultation Agreement with the Australian Securities and Investments Commission (ASIC), one of four formal agreements we have with public authorities and regulators globally.

However, there is always scope to grow our membership and influence further. When Bank of England Governor Andrew Bailey addressed our Standards Board in September, he highlighted all that FMSB Members have achieved, but also rightly encouraged those who have not yet joined us to add their support and expertise to our collective endeavour. This is something we will be looking to develop over the coming year, particularly in areas such as growing private markets.

In September we will mark the achievements of FMSB since its inception as well looking to the future - to the challenges that are to come and how we can make sure we are equipped to meet them. I would like to express our thanks to the Governor and Ashley Alder, Chair of the FCA, who have agreed to speak at this event. I look forward to hearing from them, as well as Members old and new as we enter the next phase of FMSB's development and growth.

Finally, I would like to thank my fellow FMSB Limited Board Members, as well as our Board mentoring participant for their commitment and insightful contributions over the past year. I would also like to thank the FMSB Secretariat for their hard work and commitment supporting the Advisory Council, Standards Board, Limited Board, Committees and Working Groups during 2024 and enabling all that we do to happen.

Jonathan Moulds, Chair

From our CEO



**Myles
McGuinness**
CEO

FMSB gathered significant momentum in 2024 in terms of the extent and range of topics Members asked us to examine, as well as support and recognition for what we do. Our work on pre-hedging garnered international attention for bringing industry together on a complex and contentious topic and the work of our Post-Trade Committee delivered two Standards which were welcomed by market participants, regulators and Government alike.

A particular highlight of the year was the Governor of the Bank of England's address to Members at our Standards Board in September. It was heartening to hear Governor Bailey reiterate his support for FMSB, noting all that we have achieved. He and the Executive Director of the Bank's Markets Directorate, Victoria Saporta, went on to discuss with Members how markets continue to evolve and present new challenges, how new participants are challenging existing norms and private markets present opportunities but also new risks. As we enter the 10th anniversary year of FEMR and the founding of FMSB this underlines the need for us to continue to grow and develop as markets themselves do.

We welcomed three new Members during 2024; Moody's Corporation in July and the Toronto-Dominion Bank in August, both as Full Members. The addition of Moody's adds a global research, data, and rating agency to the membership, and the addition of the Toronto-Dominion Bank increases our international reach and doubles our membership in Canada. We also welcomed digital identity provider Encompass Corporation as an Associate Member in November as a result of our work on client onboarding.

FMSB joined the International Organisation of Securities Commissions (IOSCO) as an Affiliate Member and in May, we attended our first IOSCO Annual meeting in Athens, presenting on our work on pre-hedging. Joining IOSCO supports FMSB's objectives: to identify global vulnerabilities, develop best practice, drive adherence to standards and promote international convergence. In turn, membership allows FMSB to contribute to the work of IOSCO, for example in identifying emerging risks, and informs FMSB's own standard-setting agenda.

The engagement and commitment of all our Members was evident throughout the year, whether at the Working Group level, debating issues and reaching consensus in meetings, or the focus and engagement of Advisory Council and Standards Board Members in helping to govern the process of approving new publications and setting the course for strong output in terms of our future workplan. In total, FMSB held 57 meetings across all Committees and Working Groups, plus two Advisory Council and four Standards Boards meetings. I would like to take this opportunity to thank all those representatives from across our Membership who engaged in these.

This engagement yielded considerable output during the year. Our Market Practices Committee developed and published a set of case studies, based on real pre-hedging scenarios, to help firms judge when the practice is appropriate in different contexts, supplementing our previous work on Large Trades. This work was referenced by ASIC, in guidance on pre-hedging and IOSCO in its consultation in October on the practice.

From our CEO continued

85
regulator meetings held

4
formal regulatory agreements

3
new Members joined

The dedication of Members involved in our Working Groups on post-trade resulted in two Standards: the first on Client Onboarding and the second on the Sharing of Standard Settlement Instructions (SSIs). This work, which stemmed from the recommendations of the Bank of England and FCA's Post-Trade Taskforce, shows just what FMSB is capable of in terms of developing practical, industry-led operational solutions. Adopting our SSI Standard has since been recognised as a "critical action" for firms ahead of the implementation of T+1 by the UK Accelerated Settlement Taskforce.

During the year we also issued three Statements of Good Practice: one to guide the proportionate application of a model risk management framework to electronic trading algorithms; another on the governance of sustainability-linked products, as a Transparency Draft, and finally an update of our Front Office Supervision SoGP, including important new guidance on supervision in the light of new challenges, published as a Transparency Draft in September and as final at the beginning of 2025.

At the same time as our Member-led programme of work continued apace, I focused on the three priorities that underpin our strategy as set by the Board: collaboration, international outreach and membership. We continued our significant programme of engagement with regulators in the UK and internationally, holding a total of 85 regulator meetings; 51 with international regulators and 34 with those in the UK.

We also renewed our Consultation Agreement with the Australian Securities and Investments Commission (ASIC) during the year and are grateful to ASIC Commissioner Simone Constant for speaking at our May Advisory Council. The level of engagement we have with regulators internationally is testament to how much FMSB Members' work is valued by the regulatory community,

itself underlining the value of membership.

In 2025 our work programme is as full as ever. The extent and range of themes Members are asking us to examine - from market-facing applications of AI, auto pre-hedging, digital identity and unauthorised trading - is a reflection of their engagement and trust in FMSB's processes and outputs. More information on the work of our Committees and their Working Groups can be found later in this Annual Report.

It leaves me then to thank all those who make this work possible: first and foremost, our Members who are FMSB; public authorities and regulators in the UK and internationally and the many other individuals and organisations from trade bodies to academic partners and others who make up our stakeholders. Thank you to our Chair, Jonathan Moulds and to my fellow FMSB Limited Board members for their guidance and challenge during the year as well as to Emma Mangan for her contribution as a participant in our Board mentoring programme.

Thank you also to those who provided and/or conducted work pro bono work for us: KPMG for their support with our SoGP on Front-Office Supervision, HSBC for continuing their secondment programme and the World Gold Council for supporting another secondment from EY. Secondments provide the Secretariat with much needed support as well as giving the participants an invaluable experience and career development opportunity. Finally, my thanks to all our Secretariat staff and service providers for their hard work and dedication during the year.

Myles McGuinness, CEO

From our CEO continued: **Our Strategy in Action**

FMSB's strategic priorities

Our strategic priorities as set by the FMSB Limited Board from 2022 to 2024 are shown to the right.

In 2024, we put our strategy into action in multiple ways. For example: joining IOSCO and collaborating with them and others such as ESMA on our work on pre-hedging; broadening our territorial reach with 14 international visits and 51 meetings with international regulators and expanding our membership breadth, with three new firms joining.

See opposite for a summary of our three-year strategy, including examples of how we put our strategy into action in 2024.



Objective:

Expand membership breadth as one of our key differentiators, by:

- Welcoming Moody's Corporation as a Member, reflecting the key role data service providers play in our markets
- Broadening our territorial reach, with the addition of The Toronto-Dominion Bank
- Broadening our representation within the post-trade space with the addition of Encompass Corporation, a corporate digital identity provider, as an Associate Member



Objective:

Broaden our territorial reach through collaboration and building relationships with global regulators, by:

- Holding 51 meetings with international regulators during the year, including in person on trips representing FMSB to: Australia, Singapore, the US, Canada, Greece, Hungary, France, Germany, China, Hong Kong, Ireland and Belgium;
- Renewing our Consultation Agreement with the Australian Securities and Investments Commission.



Objective:

Collaborate selectively with more bodies to enhance the breadth and impact of our work, by:

- Collaborating with other standard setters and regulators such as IOSCO, ESMA and ASIC on our work on pre-hedging;
- Developing our engagement on our Post-Trade Committee's work to ensure it complements and ties into other endeavours such as the work of the UK Accelerated Settlement Taskforce.

From our CEO continued: Our regulatory engagement

“From its origins in FEMR, FMSB has evolved into a trusted forum for bringing together expertise from across global wholesale markets to address market challenges in a practical way. In 2024, the Standards on Client Onboarding and the Sharing of SSIs have been particularly valuable contributions to some of the operational issues identified by the Post-Trade Task Force which the Bank and others convened.

The success of FMSB is down to the commitment of its members. I would encourage all those with a stake in wholesale markets who are not yet involved to join this effort (including those involved in growing private markets), so that FMSB is able to continue its valuable work over the coming years.”



Andrew Bailey, Governor of the Bank of England

REGULATORY ENGAGEMENT 2024

Four formal agreements signed with regulators in the UK and globally

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We interacted with regulators, central banks and other trading public institutions around the world to raise our profile and broaden our territorial reach, including:

From our CEO continued: **Our regulatory engagement**

“FMSB continues to demonstrate its value with practical Standards, Good Practice Statements and Spotlight Reviews, developed by industry practitioners, to support well-functioning, trusted global wholesale financial markets. It has come a long way over the past decade, and with its growing membership I am confident that the FMSB will continue its contribution to the integrity of core wholesale markets on which the financial system rests.”



**Ashley Alder, Chair,
Financial Conduct Authority**

“We were pleased to renew our agreement with Financial Markets Standards Board in 2024, underlining our close working relationship and the importance ASIC places on the financial services industry committing to developing and upholding its own global standards when it comes to market practices. FMSB continues to address topics which are of interest to ASIC, and we appreciate, through the Consultation Agreement, the opportunity to observe international industry views on best practice from the various wholesale market communities represented in FMSB membership.”



**Simone Constant, Commissioner,
Australian Securities and
Investments Commission**

“We value our ongoing Consultation Agreement with FMSB, which supports New Zealand FMA’s alignment with international best practice when it comes to standards of practice in wholesale markets. Many of the topics to be addressed by FMSB are areas of particular interest for New Zealand FMA, including emerging issues such as market facing applications of AI and private market valuations. As FMSB enters its 10th year we look forward to continuing cooperation as market developments pose new global challenges.”



**Samantha Barrass,
Chief Executive, New Zealand
Financial Markets Authority**

The Work of our Committees in 2024

During the reporting period, some **435 industry leaders and senior practitioners from all disciplines and sectors, met to engage in FMSB Committees and Working Groups to create Standards, Statements of Good Practice and Spotlight Reviews. Together with members of the Advisory Council and the Standards Board, this means that some 490+ senior executives and subject matter experts are directly supporting FMSB’s work. The work of our Committees and Working Groups during 2024 is outlined in more detail below.**

The Standards Board, which oversees FMSB’s Committees and Working Groups, met four times during the reporting period. The Advisory Council met twice during the reporting period, with representation from the Bank of England, FCA, ASIC and New Zealand FMA in attendance at both governance fora.

Market Practices Committee

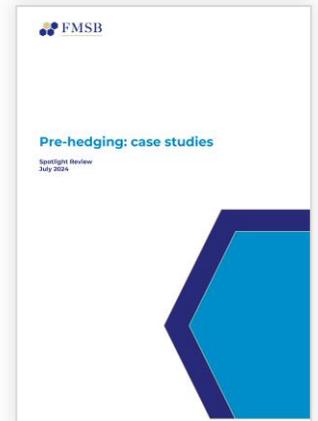
The Market Practices Committee is chaired by **Kieran Higgins**, Head of Flow Rates Trading, EMEA and Co-Head of Global Finance & Rates SM at Citi. During the first half of 2024 the Committee’s Pre-Hedging Working Group was extremely active taking forward its work to develop practical case studies to address areas of uncertainty and provide greater clarity as to what is considered acceptable and unacceptable market practice with regard to pre-hedging in different contexts.

The Committee also established a Working Group to develop guidance in relation to Grey Market Trading – the conditional trading of securities relating to a new issue, from the point of deal announcement until such securities are free-to-trade. Towards the end of the year, following horizon-scanning, the Committee identified a series of pertinent topics to potentially take forward in 2025, including: new issuance swaps; price discovery in illiquid securities; private market valuations and dealer polls.

Pre-Hedging Working Group

The Pre-Hedging Working Group, chaired by David Morris, Head of Rates for Europe at BlackRock, met four times during 2024. In July, this work culminated with the publication of a [Spotlight Review - Pre-hedging: case studies](#). The Spotlight Review supplements existing FMSB guidance applicable to pre-hedging deriving from the [Standard for the execution of Large Trades in FICC markets](#) with a series of considerations, based on real-life case studies, aimed at helping to guide firms as to if and when pre-hedging is appropriate in a range of different scenarios. The work was well received and referenced in IOSCO’s consultation on pre-hedging in the Autumn.

The Working Group is considering further work on the topic when final IOSCO guidance is issued. In the meantime, the ETT Committee is considering whether follow-on work on auto pre-hedging may be beneficial.



“These case studies are a helpful practical contribution to the broader industry debate around pre-hedging. This is precisely the type of topic where FMSB, in bringing together a diverse set of market experts, can play a valuable role.”

**Kieran Higgins, Chair,
FMSB Market Practices Committee**



The Work of our Committees in 2024 continued

Market Practices Committee continued

Grey Market Trading Working Group

Grey market trading (GMT) is the conditional trading of securities relating to a new issue from the point of deal announcement until such securities are free-to-trade. The GMT Working Group met four times in 2024 to develop a Statement of Good Practice intended to promote a common understanding of the purpose, benefits and risks associated with GMT across issuers, investors and market makers. Additionally, it will consider GMT restrictions and potential conflicts of interest for firms who are on the syndicate for the new issuance in question.

Carbon Markets

There remain frictions and challenges that are hindering these markets from achieving the scale necessary to achieve their aims of fighting climate change. These range from difficulties in the theoretical valuation of carbon credits, to knowledge and trust gaps in individual projects, to regulatory and political uncertainty.

Responding to interest from Members, FMSB is developing a continuation of its September 2022 [Spotlight Review on Voluntary Carbon Markets](#), to illuminate current issues in carbon markets more widely.

Conduct & Ethics Committee

In 2024 the Conduct & Ethics Committee focused on updating FMSB's 2017 Statement of Good Practice on Front Office Supervision, with the updated SoGP coming out in final form at the beginning of 2025. The Committee also formed a Working Group to take forward developing an associated SoGP on the issue of Unauthorised Trading.

In the light of the results of the FCA's non-financial misconduct survey, released in October, the Committee is also exploring how the findings might inform the sharing of good practice with regard to non-financial misconduct across firms and market segments.

At the end of the year Tracey McDermott, former Group Head, Conduct, Financial Crime & Compliance at Standard Chartered Bank, stood down as Conduct & Ethics Committee Chair. Gareth Murphy, Group Chief Risk Officer at abrdn and Alison Higgins,

Markets Head for UK, Europe, and the Americas and Global Head of Control for Markets at Standard Chartered Bank, agreed to take on the role of joint Chairs in January 2025.

Gareth has been on FMSB's Advisory Council since 2023 and has also played an active part in the Working Groups of the Conduct & Ethics Committee over the past two years. Alison joined the Conduct & Ethics Committee last year and chairs the Committee's Unauthorised Trading Working Group. We are grateful to Tracey for her dedication chairing the Committee for the past four and a half years.



Gareth Murphy and Alison Higgins, joint Chairs, FMSB Conduct & Ethics Committee



Front Office Supervision

The Committee's Working Group on Front Office Supervision met five times during the year, to update the Statement of Good Practice. Chaired by Chris Dickens, Head of Non-Financial Risk, Markets and Securities Services at HSBC, and supported by KPMG, the updated SoGP was published in Transparency Draft in October with the final version issued in January 2025. The update includes significant new guidance to help firms meet challenges to supervision that have emerged since 2017, amid evolving regulation, new working practices and the adoption of new technology.



"I am pleased that FMSB is able to publish this Statement of Good Practice given the key role that supervision plays in the control framework of a trading business. Given the quality of input from FMSB Member firms to our Working Group, supported by KPMG, I'm sure the document will prove valuable to firms in assessing their own approaches to supervision."

Chris Dickens, Front Office Supervision Working Group Chair



The Work of our Committees in 2024 continued

Electronic Trading and Technology Committee

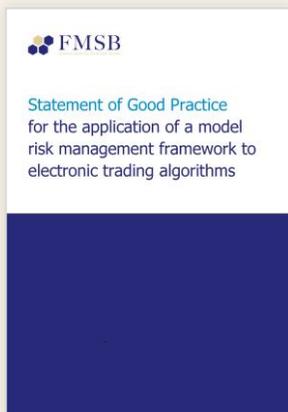
Chaired by Daniel Mayston, Head of Electronic Trading and Market Structure EMEA at Blackrock, the ETT Committee concluded its work on Algo Model Risk in the Spring, with the publication of its final Statement of Good Practice for the application of a model risk management framework to electronic trading algorithms. Our thanks to Ciara Quinlan for leading this work as Working Group Chair.

Following horizon scanning and led by Member interest, the Committee identified market-facing uses of AI as its next topic and formed a Working Group to examine and develop use cases with respect to wholesale markets on this issue, which began work in the Autumn.

The Committee is also considering examining auto-pre hedging in 2025, following work by the Market Practices Committee which highlighted the practice.



**Daniel Mayston, Chair,
FMSB Electronic Trading
& Technology Committee**



"I am pleased that FMSB is able to publish the final Statement of Good Practice for the application of a model risk management framework to electronic trading algorithms. Harnessing expertise across the industry via FMSB to create guidance of this sort is immensely valuable and I hope what we have set out today will help to support all those across the industry working in this space, as well ultimately improving market effectiveness and confidence."

Ciara Quinlan, Global Head of Principal Electronic Trading, FX, Rates and Credit at UBS, who led the Algo Model Risk Working Group



Market-Facing Applications of AI Working Group

AI use cases to date in financial services have typically focused on internal productivity and efficiency gains. However, as market participants begin to explore market-facing applications, the risks associated with such use cases will differ. Furthermore, the current broad definitions of AI capture both traditional machine learning techniques used in e-trading, as well as novel generative AI and natural language processing applications.

FMSB's Working Group, chaired by David Shelton, Global Head of FICC Electronic Trading and FX Quantitative Strategies Group at Bank of America, is focusing on market-facing AI applications in wholesale markets, distinguishing between more traditional and novel use cases, the potential risks these pose to firms, clients and markets as well and how firms might approach mitigating such risks.



**David Shelton, Chair,
Market-Facing
Applications of AI
Working Group**

The Work of our Committees in 2024 continued

ESG Committee

The ESG Committee is chaired by Caroline Haas, Head of Climate and ESG Capital Markets, NatWest Markets. In 2024, the Committee was primarily focused on developing its Statement of Good Practice on the Governance of Sustainability-Linked Products, published as a Transparency Draft in December.



Sustainability-Linked Products Working Group

Questions about the robustness of sustainability-linked products (SLPs) have given rise to greenwashing risks, undermining investor appetite for such products and creating reputational risks across different market segments. The Committee's Working Group met four times during the year to develop and agree the SoGP, which is intended to codify good practices for the governance of SLPs and support the adoption of consistent governance approaches across asset classes and jurisdictions.



Caroline Haas, Chair, FMSB ESG Committee

Post-Trade Committee

The Post-Trade Committee, chaired by David Hudson, was set up to take forward the recommendations of the Bank of England and FCA Post Trade Task Force in terms of practical implementation.

The Committee and its Working Groups were extremely busy during 2024, bringing out two Standards in Transparency Draft, one of which was published as final in December, with the second following in January 2025. As the year came to an end, the Committee identified the issue of Digital Identity,



David Hudson, Chair, Post-Trade Committee

associated with its client onboarding work, to explore in 2025 and formed a Working Group to take this forward. More information on the Work of the Post-Trade Committee can be found in our interview with Mimi Yan, Senior Technical Specialist and Post-Trade Committee lead at FMSB on page 24.

Client Onboarding Working Group

The Working Group met eight times during 2024 to take forward its work producing its [Standard for Client Onboarding: Documentation and Processes](#).

The Transparency Draft Standard was published in February and the final Standard in December. The aim of the Standard is to harmonise the data and documents required from clients, as well as codifying elements of best practice in the interaction between clients and onboarding firms, to create greater efficiency in client onboarding. The Standard is drafted to allow onboarding firms to continue to fully apply the UK's Risk Based Approach to KYC, providing more granular, documentary guidance for the practical implementation of the UK Money Laundering Regulations.



"This Standard is a big step forward in terms of harmonising and improving the onboarding process for both clients and firms. I would like to thank FMSB and all those who participated in the Working Group for their contributions to make this happen. FMSB provides a unique forum to debate, but crucially also agree and implement solutions to issues like onboarding, which have been frictions in the market for a long time."

Siobhan Clarke, who chaired FMSB's Client Onboarding Working Group



The Work of our Committees in 2024 continued

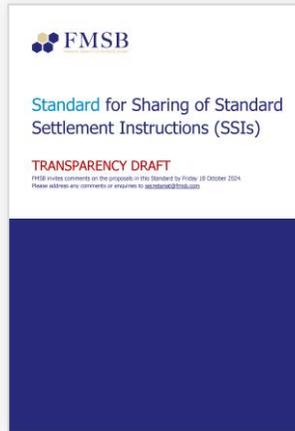
Post-Trade Committee continued

Non-Economic Trade Data Working Group

The Working Group convened six times during the year to take forward its work creating a [Standard for Sharing of Standard Settlement Instructions \(SSIs\)](#), with its Sub-Working Group meeting nine times. The Transparency Draft Standard was published in September, with the final version following in January 2025.

The aim of the Standard is to increase the adoption of electronic solutions that allow for standardisation and pre-authentication of settlement instructions, and which facilitate Straight-Through-Processing, to improve the efficiency of SSI management by recipient counterparties and reduce settlement fails through incorrect SSIs. This is particularly important as the UK approaches T+1 and adopting the Standard was subsequently recommended as a “critical action,” by the UK Accelerated Settlement Taskforce in its [implementation plan](#) for the UK’s transition.

Where electronic solutions may not yet be legally or operationally feasible, the Standard also includes templates for the manual sharing of SSIs. These were developed in conjunction with [ISITC](#) and incorporate an industry-standard taxonomy based on ISO 20022.



Uncleared Margin Working Group

The Bank of England’s Post-Trade Task Force report highlighted inefficiencies in the processes for exchanging uncleared margin - the collateral required to be exchanged between counterparties with respect to over-the-counter (OTC) derivative trades – including high settlement fails and costs.

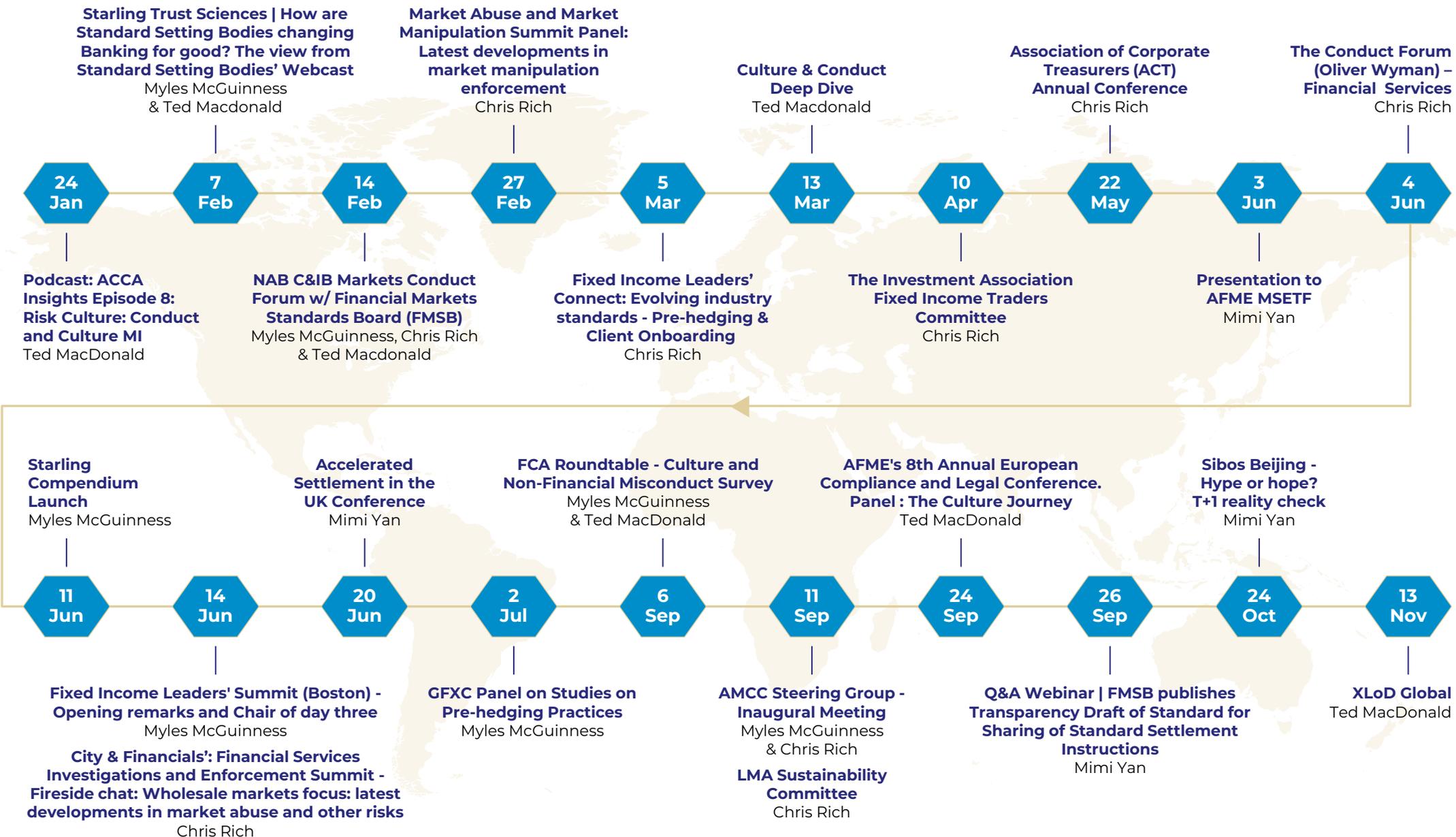
Responding to this, FMSB formed an Uncleared Margin Working Group to identify inefficiencies and suggest possible solutions. During 2024 the Group met five times to develop a Spotlight Review. As part of this work, FMSB conducted a survey of Members on uncleared margin. The Spotlight Review, including the survey results, was published in May 2025 and suggests areas of operational improvement in the functioning of OTC derivative markets, which could be implemented by firms now, as well as areas which could be improved in the future.

“Failing settlement instructions are ultimately expensive for all market participants as well as the broader economy. The further standardization of data fields, and automation of the sharing process has been critical for some time and has been made even more urgent as we approach T+1. We as a Working Group are proud to have produced a Standard that commits our Members to furthering the automation of SSIs wherever possible, while improving the process for manual sharing in these residual cases. FMSB as a forum has been invaluable for bringing together diverse market participants to get a solution to this longstanding issue and I would like to thank them for steering us throughout and getting to this stage.”

Tim McLeod, Global Head of Securities Lending Operations and Head of International Investment Operations at Blackrock, who chaired the FMSB Working Group which developed the Standard



FMSB Key Industry Engagements: January to December 2024



Expanding Membership Breadth



Firms who joined us in 2024

The Toronto-Dominion Bank – Full Member

“We are excited to join FMSB and contribute our expertise to the important work of driving and maintaining standards across our industry. This membership underscores our commitment to innovation and ensuring excellence in what are best market practices. We look forward to working collaboratively with our peers to deliver solutions that benefit TD, our clients and global wholesale markets.”

Chris Vogel, Vice Chair and Co-Head of Global Markets, TD Securities



Moody's Corporation – Full Member

“Moody's is pleased to participate in FMSB's Committees and Working Groups to help identify vulnerabilities within the financial ecosystem and gain comprehensive insights that will help us turn today's risks into tomorrow's opportunities. Joining FMSB affirms our commitment to upholding trust through integrity.”

Nick Miller, Global Head of Regulatory Affairs at Moody's Corporation



Encompass Corporation – Associate Member

“We are delighted to be joining FMSB as an Associate Member. We look forward to working with FMSB Members from across the wholesale markets and to contributing to the excellent work of the Post-Trade Committee. As a provider of digital identification and verification to firms operating in the wholesale markets, helping to establish good practices in areas like client onboarding is of the utmost importance to us.”

Henry Balani, Global Head of Industry & Regulatory Affairs at Encompass



Governor of the Bank of England addresses FMSB Members

We were honoured to welcome the Governor of the Bank of England and the Executive Director of the Markets Directorate to our Standards Board meeting on 26 September 2024, hosted by UBS at their offices.

Andrew Bailey and Victoria Saporta reflected on all that FMSB has achieved since it was established, as well as discussing with Members how markets constantly continue to evolve, how new participants are challenging existing norms, and how private markets present opportunities but also new risks.

FMSB CEO Myles McGuinness said:

“We are grateful to the Governor and the Executive Director for Markets for taking the time to speak at this meeting and more widely for their continued support for FMSB. Almost ten years on from the Fair and Effective Markets Review, our purpose – raising standards across global wholesale markets – remains as important as ever.”



Governor of the Bank of England addresses FMSB Members continued



Excerpts from the Governor’s address:

“ The financial crisis and all the scandals that emerged in its aftermath represented a major turning point in people’s trust in financial markets and institutions more generally. That’s why the Fair and Effective Markets Review that the Bank of England, the Treasury and the FCA put out in 2015 was so important. This agenda of improving standards so that markets become more transparent, fair and effective remains vitally important to the Bank.

“ The establishment of FMSB was a recommendation of the FEMR review. And a crucial one, filling several kinds of gaps where regulation itself can’t reach – by being agile; by going beyond regulated markets; and by providing practical, guidance grounded in up-to-date, practical

realities at the coal-face and built up by painstaking, thoughtful consensus-building – for which industry leadership is crucial.

“ Nine years on – and FMSB has played an important role in doing all of these. We’ve been impressed by the great standards, statements of good practice and spotlight reviews you’ve produced across your broad waterfront – including on many subjects dear to our hearts at the Bank – a testament to the FMSB and to the hard work of its members. And the timely slate of work you have on your plates now is a testament to the enduring value of the organisation.

“ We remain keen to support the FMSB’s mission to make markets more fair, transparent and effective. ”



Governor of the Bank of England addresses FMSB Members continued



Q&A with Mimi Yan, Senior Technical Specialist and Post-Trade Lead, FMSB



You've been helping to support the work of FMSB's Post-Trade Committee since it was established in 2022. Can you tell us more about how and why the Committee came into being?



April 2022 marked the publication of the Post-Trade Task Force's final report. This was a cross-market group of operations experts, convened by the Bank of England and Financial Conduct Authority, and chaired by David Hudson, who still leads FMSB's Post-Trade Committee.

The report contained recommendations across three areas: Non-Economic Trade Data, Client Onboarding, and Uncleared Margin. However, to achieve the critical level of adoption required for these recommendations to be successful, would require consensus across the markets on the details of their implementation.

Being a cross-market and consensus-led organisation, the then Executive Director for Markets of the Bank and Director for Markets at the FCA, approached FMSB and its Members to take forward this work and we have now delivered a publication on each of the three topics: two Standards on Standard Settlement Instructions and Client Onboarding, and one Spotlight Review on Uncleared Margin (in May 2025). We are now looking to new areas where standardisation could benefit the market, with Digital ID being the first new workstream.



[Client Onboarding: Documentation and Processes](#) was the Committee's first Standard, issued in final form in December 2024. What is this Standard intended to help firms with?



To take a step back, the purpose of client onboarding is to get to know a new client, or refresh a relationship with an existing client, sufficiently well that future business can be conducted efficiently, and in the knowledge that such business is for legitimate purposes. These are very worthy goals.

However, there has been growing consensus that the divergent approaches taken by firms (which under many jurisdictions' Anti Money Laundering regulations is principles-based) have led to unnecessary inefficiencies. This not only costs the onboarding firms but the clients too, in the form of both costs, and lost opportunities to conduct business.

This Standard is intended to harmonise the baseline data point and documentary requirements for onboarding a client, while recognising that KYC is still a risk-based exercise. The implication for clients is that they now have a common core set of documents that can be presented to any institution which subscribes to the Standard, and onboarding firms can reallocate resources to other strategies to combat financial crime – such as transaction monitoring.

It is a huge topic, so the first edition of the Standard focuses on the UK's regulatory requirements, but we hope to see positive results following its adoption, in which case, the Working Group is enthusiastic about expanding to other jurisdictions as well.

Q&A with Mimi Yan continued



The Committee issued a second [Standard for Sharing of Settlement Instructions \(SSIs\)](#) in final form in January 2025. Can you tell us more about why it's important to try and make the sharing of SSIs more efficient and how this Standard can help?



SSI-related issues are one of the largest causes of settlement fails, and yet automated solutions, which both significantly cut down on the risk of errors, and reduce the operational inefficiencies of manually-sent SSIs, are not fully adopted by the market.

With T+1 settlement already in place, or being implemented, in more and more markets, everyone will have significantly less time to correct any errors, and run the real risk of a failed settlement.

The Working Group quickly identified a gap in previous efforts to increase automation – they were targeted at the clients, when many clients in fact use custodians to manage their SSIs on their behalf. These custodians have the infrastructure to be able to automate their clients' SSIs, but the conversations were rarely being had. That's why the scope covers not just Members' own SSIs, but those of their clients where that agent relationship exists.

There was also recognition, however, that there may remain a segment of the market where automation isn't operationally or legally feasible. How that works today is that SSIs are communicated in different formats, using slightly different taxonomy. The Working Group therefore also took the opportunity to review market standards for taxonomy, and combined this with new templates which can be used for the residual,



You also wear a different, voluntary hat, as Co-Lead of the Operational Issues Working Group for the UK Accelerated Settlement Task Force Technical Group (TGT+1). Can you tell us a bit about that role and how it complements your work with the Post-Trade Committee?



The Operational Issues Working Group covers four distinct segments: static data, settlement, Financial Market Infrastructure resilience, and corporate actions. For each, the question at hand has been – what needs to be done ahead of the UK move to T+1, and how can this be achieved? We've had the fortune of excellent sub-stream leads, and a large number of Subject Matter Experts who have volunteered, and continue to volunteer, their time – as well as strong support from all the UK authorities.

Although distinct from the Post-Trade Committee work, there are definite synergies. For example, had it not been for the Post Trade Task Force front-running the efforts to create SSI standards, it would have been challenging for the market to have compiled the Core Principles and Templates to the level of detail required, and in the time required for the market to adopt. And the benefit of large market changes such as this one means that a spotlight is shone on operational issues – creating a focus on implementation.



You attended the global financial conference Sibos in Beijing in 2024. Can you tell us a bit about what you spoke about and learnt from the experience?



Our panel was about accelerated settlement, with speakers from around the world and representing all segments of the market – investors, to custodians, regulators, and market-led initiatives such as the UK Accelerated Settlement Taskforce (and of course FMSB). It was great to hear both from the other speakers, and audience polls, as to the support that accelerated settlement has across the market – but cautious support, as in today's globalised markets, cross-border considerations and allowances for time zones need to be clearly thought out.

There were some excellent other sessions too, and a general thematic: we all know that better data is important for operations – but to see the extent of support for greater standardisation, and the potentially transformative applications of new technologies, was eye-opening.

Speaking at SIBOS 2024



Q&A with Mimi Yan continued



What next for the Post-Trade Committee in terms of its workplan?



We're focused on Digital ID (for non-natural persons) at the moment. It's a natural extension of the Client Onboarding work – going from disparate ways of proving a corporate's existence and key data about it prior to the Client Onboarding Standard, to a more harmonised framework after, and now hopefully the ability for a corporate to be “one and done” – at least with respect to core data.

As a human person, it's amazing to think about the ease at which we can cross borders today, and much of that has been the incredibly detailed international work done around standardising the form, contents, even the specifications around printing. With the relatively recent addition of the biometric chip, newer passports are securer than before.

It doesn't mean that visas aren't required for specific kinds of visits, or to certain countries. It doesn't guarantee entry. And it doesn't mean that there is never fraud. But with one single pocket-sized booklet, we can prove who we are to the satisfaction of border agents around the world that we are who we say we are. We can, and should, be doing the same for corporates.



Before working for FMSB, you spent a decade working in Capital Markets structuring, Risk, and Treasury functions, including stints at Bank of America Merrill Lynch and Credit Suisse. What drew you to FMSB?



It certainly seems like an odd portfolio of jobs on the surface! But what links them all is, at the time I held those roles, they were all areas undergoing significant regulatory change. My job always touched on either, or both, of what that change should be at a policy level, or how best to implement in a balanced, rational manner.

I enjoy working through change; it gives us a space to step back and think about how we want the world around us to look like, and the intellectual challenge of identifying all the stakeholders and tangential problems to consider. Nothing feels more satisfying than successfully negotiating the package and bringing that all together, and being on the Secretariat for FMSB delivers this every day.

As a teenager, I used to want to be a diplomat for the United Nations; quite often it feels like I'm doing just that now, but for financial market participants, rather than countries!



When you are not working hard helping support FMSB Members to make post-trade processes more efficient what do you enjoy doing in your spare time?



The more unusual hobby first – I am one of very few people worldwide today who creates Shetland lace! This is an ancient technique which combines wool almost as thin as a human hair with delicate geometric patterns, and knits them into huge shawls, yet which should ideally fit through a wedding ring. We often think about “crafts” as less worthy than “arts”, but some of these heritage designs combine engineering with maths and aesthetics, and are beautiful.

I also returned to ballet a few years ago. What is wonderful about ballet is that it requires complete concentration in the moment, and being on your toes, inhibiting the music, takes you to a different world. It is also a very humbling activity – so much can go wrong, and everything can always be better.

Thinking about it, what unites them is their precision and strive towards perfection. Perhaps there is a tenuous link to standardisation and operational efficiency!

Members as at 31 December 2024

Member Firms

1. abrdn	21. J.P. Morgan
2. AstraZeneca	22. Lloyds Bank Corporate Markets Plc
3. Australia and New Zealand Banking Group	23. Moody's Corporation
4. BAE Systems	24. Morgan Stanley & Co. International Plc
5. Bank of America	25. National Australia Bank
6. Barclays	26. NatWest Markets
7. BHP	27. Nomura
8. BlackRock	28. Rio Tinto
9. Bloomberg	29. Royal Bank of Canada
10. BNP Paribas	30. Royal Mail Group
11. BNY	31. Santander CIB
12. BP	32. Shell plc
13. Citigroup Global Markets Limited	33. Société Générale
14. Commonwealth Bank of Australia	34. Standard Chartered
15. Crédit Agricole CIB	35. The Toronto-Dominion Bank
16. Deutsche Bank	36. UBS
17. DTCC Europe Limited	37. USS Investment Management
18. Goldman Sachs	38. Vodafone
19. HSBC	39. Westpac Banking Corporation
20. Invesco	

Associate Member Firms

40. Encompass Corporation
41. Mizuho International Plc
42. Tradition
43. XTX Markets

Partner Member Firms

44. KPMG
45. Oliver Wyman
46. Starling Trust Sciences
47. World Gold Council

Affiliate Member Firms

48. Association of Corporate Treasurers
49. Australian Financial Markets Association
50. Standards Board for Alternative Investments

Legal Adviser

51. Linklaters

Members continued

Advisory Council Members

abrdrn	Gareth Murphy
AstraZeneca	Jonathan Slade
Australia and New Zealand Banking Group	Paul Moore
BAE Systems	Raj Patara
Bank of America	Muraari Vasudevan
Barclays	Filippo Zorzoli
BHP	Stewart Cox
BlackRock	Jatin Vara
Bloomberg	Joe McHale
BNP Paribas	Hubert de Lambilly
BNY	David McAnany
BP	Colin Adams
Citigroup Global Markets Limited	Tiina Lee
Commonwealth Bank of Australia	Chris Mclachlan
Crédit Agricole CIB	Walid Assaf
Deutsche Bank	David Wayne
DTTC Europe Limited	Michalis Sotiropoulos
Goldman Sachs	Patrick Street
HSBC	Richard Blackburn
J.P. Morgan	Pranav V Thakur
Linklaters (Legal Advisor)	Michael Kent
Lloyds Bank Corporate Markets Plc	Nick Hughes
Morgan Stanley & Co. International Plc	Christopher Beatty

Advisory Council Members

National Australia Bank	David Bateman
NatWest Markets	Donal Quaid
Nomura	John Goff
Rio Tinto	David Niotakis
Royal Bank of Canada	David Thomas
Santander CIB	Michael Bagguley
Shell plc	Sam Critchlow
Société Générale	Mohamed Braham
Standard Chartered	Bruno Lettich
The Toronto-Dominion Bank	Sharon Kim
UBS	Christophe Patricot
USS Investment Management	Ben Clissold
Westpac Banking Corporation	Max Bulloch

Partner Advisory Council Members

Partner Member	Advisory Council Member
KPMG	Karim Haji
Oliver Wyman	Christian Edelmann
Starling Trust Sciences	Stephen Scott
World Gold Council	David Tait

Affiliate Advisory Council Members

Affiliate Partner Member	Advisory Council Member
ACT – Association of Corporate Treasurers	Annette Spencer
Australian Financial Markets Association	Brett Harper

Members continued

Standards Board Members

abr dn	Louise Drummond
Australia and New Zealand Banking Group	Paul Moore
Bank of America	Mauricio Sada-Paz
Barclays	Tyler Wellensiek
BHP	Stewart Cox
BlackRock	David Morris
Bloomberg	Wayne Barlow
BNP Paribas	Alexandre Benech
BNY	Rosie Murphy Williams
Citigroup Global Markets Limited	Mark Meredith
Commonwealth Bank of Australia	Mark Baillie
Crédit Agricole CIB	Pierre Scemla
Deutsche Bank	Daniel Morley
DTCC Europe Limited	Michalis Sotiropoulos
GFMA Global Foreign Exchange Division	James Kemp
Goldman Sachs	Nikhil Choraria
HSBC	Chris Dickens
Invesco	Karim Awenat
J.P. Morgan	Tom Prickett
Linklaters (Legal Advisor)	Michael Kent
Lloyds Bank Corporate Markets Plc	Rob Hale
Morgan Stanley & Co. International Plc	Daniel Aksan
Moody's Corporation	Nick Miller
National Australia Bank	Hugh Whitworth
NatWest Markets	Phil Lloyd

Standards Board Members

Rio Tinto	David Niotakis
Royal Bank of Canada	Christophe Coutte
Santander CIB	Jan Lundstrom
Standard Chartered	Bruno Lettich
The Toronto-Dominion Bank	Campbell Gilbert
UBS	Jonathan Fletcher
USS Investment Management	Ben Clissold
Westpac Banking Corporation	Andrew Martin

Partner Standards Board Members

Partner Member	Standards Board Member
KPMG	Peter Rothwell
Oliver Wyman	Catherine Brown
Starling Trust Sciences	Erich Hoefler
World Gold Council	David Tait

Affiliate Standards Board Members

Affiliate Partner Member	Standards Board Member
Association of Corporate Treasurers	James Winterton
Australian Financial Markets Association	Brendon Harper
Standards Board for Alternative Investments	Thomas Deinet

Members continued

Committees and Working Groups

Membership Group	Chair	Company Name
Market Practices Committee	Kieran Higgins	Citigroup Global Markets Limited
Pre-Hedging Working Group	David Morris	BlackRock
Grey Market Trading Working Group		
Electronic Trading & Technology Committee	Vacant	
AI Working Group	David Shelton	Bank of America
ESG Committee	Caroline Haas	NatWest Markets
ESG Sustainability-Linked Products Working Group	Caroline Haas	NatWest Markets
Post-Trade Committee	David Hudson	
Client Onboarding Working Group	Siobhan Clark	Royal London
Non-Economic Trade Data Working Group	Tim Mcleod	BlackRock
Uncleared Margin Working Group	Warren Rees	J.P. Morgan
Digital Identity Working Group	James Rochford	Deutsche Bank
Conduct & Ethics Committee	Tracey McDermott	Standard Chartered
Front Office Supervision Working Group	Chris Dickens	HSBC
Unauthorised Trading Working Group	Alison Higgins	Standard Chartered
Legal Working Group	Michael Kent	Linklaters

Advisory Council and Standards Board observers

Bank of England	Victoria Saporta
Financial Conduct Authority	Paul Johnson
Australian Securities & Investments Commission	Andrew Templer
New Zealand Financial Markets Authority	Daniel Trinder

Statements of Commitment

FMSB Standards set out Core Principles and accompanying guidance on the most important aspects of practice where ambiguity undermines fair and effective markets. FMSB Members are expected to adopt the Standards in their businesses (where they agree to do this as part of their membership, and they are engaged in the relevant market or activity) and to attest to this through an annual Statement of Commitment which can be found on our website. For the Adherence year which ended 31 December 2023, and were relevant Members adhered to nine Standards. Further details can be found on our [website](#).

How to become an FMSB Member

FMSB Members represent global wholesale financial market participants. Our membership as of 31 December 2024 included corporate issuers, asset managers, custodians and intermediaries, commercial and investment banks, pension funds, interdealer brokers and the firms that provide the infrastructure for markets to operate, such as data services providers.

To discuss membership with us, email: secretariat@fmsb.com, call +44(0)203 961 6150, or write to: First Floor, 4 City Road, Finsbury Square, London, EC1Y 2AA.

Financial Markets Standards Board Limited Board of Directors

About Our Board

Constitution and role

FMSB is formally governed by way of a legal entity, Financial Markets Standards Board Limited, a company registered in England and Wales (registered number 09732893). Its registered office is 4 City Road, Finsbury Square, London, EC1Y 2AA.

FMSB is a not-for-profit organisation funded by Member subscriptions. All directors of FMSB Limited are non-executive in that they are not members of the FMSB executive team, with the exception of the CEO.

The Board takes ultimate ownership of the Company's strategic direction, with support from the membership through the Advisory Council, and provides the necessary frameworks within which the management of the Company can act in the best interests of the membership.

Board activities during 2024

The FMSB Limited Board met on four occasions during the year, including at a Strategy Away Day in September 2024.

At the end of the reporting period, the Board of Directors consisted of the non-executive Chair (Jonathan Moulds), six NEDs (Charles Nichols, Niki Beattie, Michael Cole-Fontayn, Philippa Foster Back, Edward Ocampo, and Stephen O'Connor) and CEO Myles McGuinness.

In September 2024 the FMSB Limited Board considered and approved the Audit Report and Financial Statements for the 15-month period to 31 March 2024 (after the accounting year end was changed from 31 December to 31 March) audited by Lubbock Fine LLP. No adverse issues were raised in the Audit Report.

Board tenure and composition

Non-executive directors are appointed to the Board for a three-year term. After that term, a non-executive director may be eligible for reappointment for a further year, subject to satisfactory performance and the regular nomination and approval processes. To ensure that the Board maintains a diverse mix of skills, views and experience, it is expected that all non-executive directors should serve no more than nine years in total.

The Board undertakes an ongoing review of the skills of its directors and they believe that the Board is well-balanced and possesses sufficient skills, relevant experience and knowledge to ensure that it functions effectively. In 2024 the Board agreed to maintain the current level of gender diversity (at least 25% female representation) but aims to achieve higher representation as soon as the next opportunity arises.

Board committees

The Board has delegated some of its responsibilities to its two formal committees, the Audit & Risk Committee and the Nomination & Remuneration Committee, whose terms of reference have been approved by the Board.

(i) Audit & Risk Committee (A&RC)

Chaired by Charles Nichols the committee provides oversight of, and reports to the Board on, the company's financial reporting and budgeting process, the audit process, its internal financial control and risk management system and its internal policies and procedures.

At the end of the reporting period the Audit & Risk Committee consisted of Charles Nichols (Chair), Philippa Foster Back, Edward Ocampo and Jonathan Moulds. They met four times during the year.

(ii) Nomination & Remuneration Committee

Chaired by Niki Beattie the committee provides oversight of, and reports to, the Board on ensuring that the Board retains an appropriate structure, size and balance of skills to support the strategic priorities and values of the company; undertaking arrangements for appointments to the Board and to the Company and succession planning; and reviewing and approving remuneration arrangements made in relation to employees.

At the end of the reporting period the Nomination & Remuneration Committee consisted of Niki Beattie (Chair), Michael Cole-Fontayn, Stephen O'Connor and Jonathan Moulds. They met twice during the year.

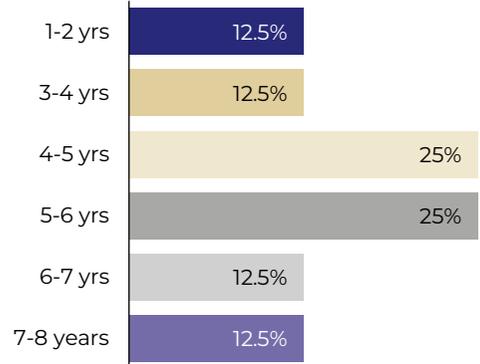
During the year, this Committee successfully concluded its pilot mentoring programme to give individuals from the financial services industry the opportunity to gain practical board experience for a potential future board role. Two candidates took part in the programme. Sabina Liu concluded her year at the end of 2023 and Emma Mangan in July 2024.

The Board agreed to run the programme again in 2025 and the two candidates took part in a video to share their experiences and encourage applicants.

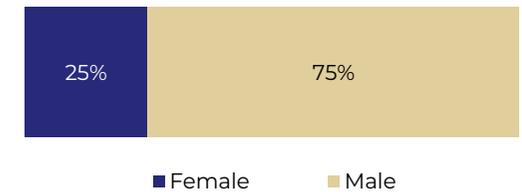
[Watch FMSB Board Mentoring Programme](#)

Board balance

Tenure



Gender diversity



Independence



Financial Markets Standards Board Limited Board of Directors continued



Jonathan Moulds, CBE
Chair & Director

Jonathan became Chair and Director of FMSB Limited and Chair of the FMSB Advisory Council in June 2023. Having worked in the UK, US and Asia during his 25+ year executive career, Jonathan spent the majority of his career at Bank of America where he became head of Bank of America's international businesses and subsequently European President of Bank of America Merrill Lynch and the CEO of Merrill Lynch International following the merger of the two companies in 2009. Until December 2016, Jonathan was Group Chief Operating Officer at Barclays Plc.

Since then, he has assumed a number of non-executive roles and is the Senior Independent Director and Chair of the Risk Committee at IG Group, the listed global leveraged trading platform, Chair of Citi's International Broker Dealer CGML and Chair of Litigation Capital Management, a listed litigation finance provider focused on global commercial disputes.

During his executive career, Jonathan has been active in numerous industry bodies including as Chair of the International Swaps and Derivatives Association (ISDA), an inaugural Board member of the Association of Financial Markets in Europe (AFME) and a Board member of the Global Financial Markets Association (GFMA). He was the founding Chair of OTCDerivNet (the online clearing initiative for OTC products).



Philippa Foster Back, CBE
Senior Independent Director

Philippa Foster Back CBE became the Senior Independent Director of Financial Markets Standards Board Limited on 1 January 2022 and has been a Director since June 2020.

Until April 2020 she was Director of the Institute of Business Ethics (IBE), a role she held since 2001. The IBE's work is focused on promoting high standards of business behaviour based on ethical values.

Philippa was previously Group Treasurer at EMI Group, Group Finance Director at DC Gardner Group and Group Treasurer at Bowater. Philippa has also held a number of trustee, major review committee and non-executive roles throughout her career.

She is a past President of the Association of Corporate Treasurers (ACT) and a former member of the BEIS/FRC Wates Coalition Group, and was a non-executive director of the CISI Board as well as a member of its Integrity Forum until July 2020.



Niki Beattie
Director & Chair of the Nomination & Remuneration Committee

Niki became a Director of Financial Markets Standards Board Limited in June 2020. Niki has extensive corporate governance experience on the boards of both listed and private companies in financial markets, as well as serving on two European regulatory committees.

Niki is a non-executive director of IRESS, a listed Australian financial technology company and Chair of ClearToken, a start-up that will introduce a clearing house to the digital asset marketplace. She was the Chair of Aquis Exchange PLC, a pan-European MTF (multilateral trading facility), until 31 December 2021 and the Chair of XTX Markets Limited, a quantitative-driven electronic market-maker, until 30 September 2022.

Niki is also the CEO and Founder of Market Structure Partners, an independent consulting firm and is a member of ESMA's Secondary Markets Advisory Committee, and was also a member of the FCA's Regulatory Decisions Committee for six years. Prior to setting up Market Structure Partners, Niki spent 14 years at Merrill Lynch in roles including EMEA Head of Market Structure.



Michael Cole-Fontayn
Director

Michael became a Director of Financial Markets Standards Board Limited in March 2019.

Michael is a Director of J.P. Morgan Securities PLC and the Chair of the Chartered Institute for Securities and Investment (CISI), the largest professional body for the securities and investment profession in the UK. He was the Chair of the Association for Financial Markets in Europe (AFME) from September 2015 until June 2021.

Michael was previously EMEA Chair of BNY Mellon, responsible for governance, culture and strategy development across the region.

Before taking up the EMEA Chair of BNY Mellon, he spent 25 years in various roles at both BNY Mellon and Bank of New York in London, Hong Kong and New York.

Financial Markets Standards Board Limited Board of Directors continued



Charles Nichols

Director & Chair of the Audit & Risk Committee

Charles has been a Director of Financial Markets Standards Board Limited since January 2017 and was the Senior Independent Director until 31 December 2021.

Charles spent 31 years at Unilever where he held various financial and general management roles, including the senior management positions of Group Treasurer, Group Controller and Executive Vice President respectively, and is a former member of the Board of Trustees of the Unilever UK Pension Fund and Former Chair of its Investment and Funding Committee. Charles is also a Director of Jaguar Land Rover Automotive PLC and Chair of its Audit Committee.



Edward Ocampo

Director

Edward became a Director of Financial Markets Standard Board Limited in March 2019.

Edward is a Non-Executive Director and Chair of the Board Risk Committee at J.P. Morgan Securities plc. He is also an Independent Member of the ICE Swap Rate & Term Reference Rate Oversight Committee and an Affiliate of Rutter Associates LLC.

From 2018 to 2022 he was an Advisory Director at Quantile Technologies Limited and from 2014 to 2018 he was a Senior Advisor at the Bank of England. Edward was previously at Morgan Stanley for 24 years where he held a number of senior roles and most recently was Head of Fixed Income Risk Management for EMEA and a Director of Morgan Stanley's UK bank.

Edward received his MBA degree from Stanford University in 1983 and his AB degree in Economics from Princeton University in 1979.



Stephen O'Connor

Director

Stephen became a Director of Financial Markets Standards Board Limited in December 2018.

Stephen is the former Chair and founder of Quantile Technologies Limited, which provides portfolio risk management services for derivative markets, before its purchase by London Stock Exchange Group plc.

He is the Chair of HSBC Bank plc and was a Non-Executive Director of London Stock Exchange Group plc until August 2021.

He was a Non-Executive Director of GE Capital International Holdings Ltd between 2015 and 2017 and of the International Swaps and Derivatives Association (ISDA) between 2009 and 2014 including three years as Chair.

He was also the Chair of OTC Deriv Ltd between 2001 and 2011. Stephen was at Morgan Stanley for 25 years where he was a Managing Director and Member of the Fixed Income Division Management Committee. Stephen is a qualified Chartered Accountant.



Myles McGuinness

Chief Executive Officer & Director

A long-term advocate for raising standards of conduct and ethics in financial markets, Myles McGuinness joined FMSB as CEO in June 2021.

His career in investment banking spans 30 years across sales and structuring, deal origination, strategy development and the management of regulatory relationships. He has worked in the UK, the US and prior to joining FMSB, in the Netherlands, responsible for a pan-European Capital Markets business.

Myles has chaired Reputational Risk Committees and held several Conduct and Risk committee roles, which included overseeing a Federal Reserve Board remediation programme.

He studied Economics and Geography at the National University of Ireland, Galway and received a MSc in Investment and Treasury from Dublin City University.

FMSB Secretariat Team

Our Team, the FMSB Secretariat, strives to uphold the highest standards in the way we support FMSB Members and stakeholders. Our shared values represent a pledge to provide the continuing support, value and excellence they expect from us.

The Secretariat underwent a number of changes in 2024. One of our secondees, Rosie Garwood from EY, left in February and Georgina Mead, on secondment from HSBC, left in April. They were replaced by Kyle Osborne from EY in October and Helen Kelly from HSBC in November, both joining us for six months.

Secondments both provide the Secretariat with much needed support and give the participants an invaluable and enriching career development opportunity by exposing them to a wide range of topics in financial markets. We would like to thank all our secondees for their contributions, as well as our Member firm sponsors for their continued support in facilitating them.

Laura Conaghan joined us on a consultancy basis to support with external communications in January for an initial six months, which was renewed in September.

Our Team Values



Sustainability

As a small Secretariat, we are committed to embedding ESG principles in the way we work.

Environmental: we are committed to supporting sustainable finance through the work of our Members (see page 16 for more detail on the ESG Committee's work). We operate as an environmentally-aware organisation, working from home two days a week and minimising our environmental impact on other ways such as via paperless Board, Committee and WG meetings.

Social: through our Team Values, we are committed to an inclusive culture at FMSB. We provide career development and mentoring opportunities on an annual basis via several secondee positions and also run an annual Board mentoring programme.

Governance: we are committed to strong governance with the Board taking ultimate ownership of the Company's strategic direction, with support from the Membership through the Advisory Council.

FMSB Secretariat Team as at 31 December 2024



Alison Parker
Chief of Staff

Alison joined FMSB in November 2018. As Chief of Staff, she oversees the day-to-day operations of the Secretariat and the business of FMSB Limited, including supporting the FMSB Limited Board, the Advisory Council and Standards Board, as well as managing various projects.

Alison read Law at Edinburgh University and then qualified as a Chartered Accountant while at Coopers and Lybrand, before moving to Credit Suisse First Boston (CSFB) where she became the Global Head of Compensation and Executive Compensation. After leaving CSFB, she undertook various freelance compensation consultancy roles, ran various private property businesses and was a partner in her family farming business.



Carol Boag
Business Assistant

Carol joined FMSB in March 2020 and supports the Chair and Chief Executive Officer. She also assists the Chief of Staff and Secretariat with event planning and management, and special projects.

Carol has an extensive background in board and senior-level support and event management, most recently at Morgan Stanley.

She read Italian at the University of Reading.



Christopher Rich
General Counsel and Head of Standards

Chris has overall responsibility for all FMSB Working Groups and their publications.

Since joining FMSB in April 2020, Chris has played a key role in delivering Standards, Statements of Good Practice and Spotlight Reviews on a broad range of topics including those relating to primary and secondary markets, electronic trading, ESG and conduct and culture.

Prior to joining FMSB, Chris spent nine years at Linklaters in the Financial Regulation Group advising a wide range of investment banks, market infrastructure providers and buy-side institutions on numerous areas of UK and European financial regulation. Chris holds an LLM in international financial law and regulation from the London School of Economics.



Helen Kelly
HSBC Secondee

Helen is currently on a six-month secondment from HSBC supporting the FMSB workstreams. She has over 20 years' experience in financial markets. Helen started her career in Issuer Services roles at both Citi and HSBC, before moving into Non-Financial Risk at HSBC covering Markets and Securities Services.

Helen has a BA (Hons) degree in English and Business.

FMSB Secretariat Team as at 31 December 2024 continued



Kyle Osborne
EY Secondee

Kyle joined FMSB in October 2024 on a six-month secondment from EY, where he spent a year working on e-trading controls, digital assets, consumer duty, and GenAI. At FMSB, he supports the various ongoing workstreams.

Kyle holds a BA in Economics from Durham University, graduating in 2023.



Mimi Yan
Senior Technical Specialist

Mimi Yan joined FMSB in March 2022. Mimi has over a decade of experience in regulatory policy change across Capital Markets structuring, Risk, and Treasury functions.

Following her BA (Hons) in Law from Trinity College, Cambridge, Mimi began her career at Bank of America Merrill Lynch first in M&A financing, and then as a hybrid bond structurer in Debt Capital Markets, predominantly covering financial institution clients.

At Credit Suisse, Mimi served as acting head of EMEA Treasury Capital, before transferring to the Zurich office. There, she was global lead for Recovery Planning, working closely with Risk, global desk heads, chief operating officers and regulators, including FINMA, PRA, HKMA.

Mimi holds an LLM (Distinction) in Law and New Technologies from Birkbeck, University of London, with a focus on Regulation, Data Privacy and Intellectual Property.

Mimi works closely with Chris Rich, FMSB's General Counsel, on the development of the various FMSB publications, predominantly the Post-Trade and carbon markets workstreams. She co-led the Operational Issues Working Group for the UK Accelerated Settlement Task Force Technical Group (TT+1), preparing for the UK's move to T+1.



Sam Smith
Secretariat Support

Sam joined FMSB in January 2020. Reporting to the Chief of Staff, Sam provides operational support to the FMSB Secretariat, including membership and meeting logistics.

Sam has experience supporting at board level, as Business Assistant & Company Secretarial Assistant. Prior to joining FMSB, Sam worked in the latent defects insurance sector for CRL Management Limited.



Ted MacDonald
Senior Technical Specialist

Ted MacDonald joined FMSB in February 2022. He is a financial services practitioner having held senior roles in business origination, risk management, board-level governance, and more recently, regulation. He has helped transform banking teams and whole organisations and led major change initiatives for the UK Financial Conduct Authority.

He joined the FCA in 2014 as an Advisor and stayed on as a Technical Specialist in Conduct & Culture. He published five thematic reviews and led their flagship '5 Conduct Questions' program. This included the CEO Roundtable sessions on Leader Character, Corporate Purpose, Diversity & Inclusion and Psychological Safety, focused on elements of behavioural psychology.

Ted is a fully accredited mediator and maintains strong links with academia including his role as an unofficial ambassador for the Ivey Business School and the Leader Character Program. He relocated to London from Toronto in 1990.

Ted works closely with Chris Rich, FMSB's General Counsel, supporting the development of qualifications, conduct & ethics and thought leadership workstreams.

Summary of all FMSB publications

Standard

Publication Name	Final Release
Reference Price Transactions Standard of the Fixed Income markets	21-Nov-16
Binary Options Standard for the Commodities markets	21-Nov-16
New Issue Process standard for the Fixed Income markets	02-May-17
Risk Management Transactions for New Issuance Standard	03-Jul-18
Secondary Market Trading Error Compensation Standard	28-Jan-19
Standard for the execution of Large Trades in FICC markets	06-May-21
Standard on use of Term SONIA reference rates	28-Jul-21
Standard for the sharing of investor allocation information in the fixed income primary markets	15-Feb-22
Standard for the Conduct of Participants in LBMA Precious Metal Auctions	01-Mar-22
Standard for Client Onboarding Documentation and Processes and Annexes	19-Dec-24

Standard (Transparency Draft)

Publication Name	Initial Release	Comment Period	Final Release
Standard for Sharing of Standard Settlement Instructions (SSIs)	12-Jul-24	12-Jul-24 to 31-Oct-24	2025

Summary of all FMSB publications continued

Statement of Good Practice

Publication Name	Final Release
Surveillance Core Principles for FICC Market Participants: Statement of Good Practice for Surveillance in Foreign Exchange Markets	08-Dec-16
Statement of Good Practice for FICC Market Participants: Conduct Training	08-Dec-16
Monitoring of written electronic communications Statement of Good Practice for FICC Market Participants	15-Sep-17
Front Office Supervision Statement of Good Practice for FICC Market Participants	15-Sep-17
Suspicious Transaction and Order Reporting Statement of Good Practice for FICC Market Participants	15-Jan-19
Information & Confidentiality for the Fixed Income and Commodities markets Statement of Good Practice	03-Oct-19
Conduct Risk in Market Transactions Statement of Good Practice	28-Mar-19
Conflicts of Interest Statement of Good Practice	14-Oct-19
Statement of Good Practice for Participation in Sovereign and Supranational Auctions in Fixed Income Markets	14-Jul-20
Statement of Good Practice Trading Platform Disclosures	28-Jun-22
Statement of Good Practice for the application of a model risk management framework to electronic trading algorithms	22-Apr-24

Statement of Good Practice (Transparency Draft)

Publication Name	Initial Release	Comment Period	Final Release
Statement of Good Practice for Front Office Supervision of Wholesale Traded Markets	07-Oct-24	07-Oct-24 to 15-Nov-24	2025
Statement of Good Practice for Governance of sustainability-linked products	17-Dec-24	17-Dec-24 to 21- Feb-25	2025

Summary of all FMSB publications continued

Spotlight Reviews

Publication Name	Final Release
Behaviour Cluster Analysis (first edition)	Retired due to second edition
Database – Market Abuse and Manipulation	27-Jul-18
Emerging themes and challenges in algorithmic trading and machine learning	23-Apr-20
The critical role of data management in the financial system	11-May-20
LIBOR transition: Case studies for navigating conduct risks	11-Jun-20
Examining remote working risks in FICC markets	27-Jul-20
Examining remote working risks in FICC markets – Risk register	27-Jul-20
Monitoring FICC markets and the impact of machine learning	3-Aug-20
Measuring execution quality in FICC markets	7-Sep-20
LIBOR transition: Case studies for navigating conduct risks in back book transition	20-Apr-21
Hybrid working in FICC markets – Future risk management frameworks	30-Sep-21
Precious Metals Market Structure	18-Nov-21
Behaviour-pattern Conduct Analysis (BCA) (second edition)	30-May-22
Precious Metals Market Post-Trade	17-Jun-22
ESG Ratings	20-Jul-22
Voluntary Carbon Markets: An Overview	29-Sep-22
The 3 Lines Model: A lens on risk management frameworks	08-Jun-23
Data and Transparency in Precious Metals Markets	05-Jul-23
Conduct & Culture MI	24-Jul-23
Compendium : Precious Metals Market Evolution	12-Sept-23
Pre-hedging: case studies	26-Jul-24