

**Memorandum of Understanding (“MoU”) between (1) The Financial Markets Standards Board (“FMSB”) and (2) the United Kingdom Debt Management Office (“UK DMO”) (each the “Party” or together “Parties”)**

**Background**

1. FMSB was established pursuant to the Fair and Effective Markets Review led by the Bank of England, the Financial Conduct Authority (“FCA”) and HM Treasury (“HMT”)<sup>1</sup>. FMSB’s core mission is promoting fair and effective wholesale fixed income, currencies and commodities (“FICC”) markets for all participants in those markets.
2. The UK DMO is an executive agency of HMT and is legally and constitutionally part of HMT. The UK DMO’s main aims<sup>2</sup> are (i) to carry out the UK government’s debt management policy of minimising its financing cost over the long-term, taking account of risk; (ii) to carry out the UK government’s cash management policy of minimising the cost of offsetting the government’s net cash flows over time, while operating within a risk appetite approved by ministers; (iii) to provide loans to local authorities for mainly capital purposes; and (iv) to manage the funds of selected public sector bodies. As part of its functions, the UK DMO issues gilts and Treasury bills and transacts in the sterling money markets.
3. The UK DMO places great importance on the high standards and integrity of the FICC markets. Although the UK DMO is not a regulatory authority, the fair and effective functioning of the FICC markets is important to the UK DMO in achieving its core debt and cash management objectives.
4. In light of their respective roles and interests above, FMSB and the UK DMO have a close strategic and working relationship as set out in this MoU.
5. Nothing in this MoU supplants or modifies the law that applies to the Parties.

**FMSB Ownership, Purpose, Structure and Governance**

6. FMSB is a privately-owned organisation, funded by its members. Its primary objectives are to promote fair and effective global wholesale FICC markets by examining vulnerabilities in these markets (whether due to current, envisaged or emerging future market structures or practices); to produce clear guidance<sup>3</sup> on how business should be conducted to eliminate or mitigate these vulnerabilities; to promulgate this guidance as widely as possible globally and obtain commitments for its use. The UK DMO is supportive of these primary objectives. FMSB also contributes to work with other bodies internationally to promote global convergence of standards in FICC markets and to promote high standards of

<sup>1</sup> <https://www.bankofengland.co.uk/report/2015/fair-and-effective-markets-review---final-report>

<sup>2</sup> <https://www.dmo.gov.uk/media/ztkn5d2s/fwork040405.pdf>

<sup>3</sup> Including Standards and Statements of Good Practice



training and qualifications for personnel in FICC markets worldwide. FMSB promotes robust and open discussion of market practices and challenges in accordance with all applicable principles and requirements of competition laws.

7. FMSB does not produce any formal regulation, nor does it engage in any lobbying, representation or commercial activities. FMSB materials are designed to guide best market practice in (i) unregulated markets and (ii) regulated markets, in each case where there is need for specific guidance on market practice that is not already contained in the applicable rules and regulations. FMSB will take reasonable steps to avoid inconsistencies in its guidance and materials with existing legislation, rules, regulations and market codes aimed at promoting best practice produced by other bodies in the United Kingdom or overseas. In the United Kingdom that will include, but not be limited to: the FCA, the Prudential Regulation Authority, Global FX Committee, UK Money Markets Committee, the Joint Money Laundering Steering Group and the London Bullion Market Association.
8. FMSB is structured as a company limited by guarantee (Financial Markets Standards Board Limited ("FMSB Ltd")) with a number of formal committees that oversee aspects of its work: a Standards Board (including associated sub-committee and working groups), an Advisory Council and an Adherence Oversight Committee. The directors of FMSB Ltd and the members of its committees (including associated sub-committees and working groups) are appointed by FMSB governance processes.
9. FMSB prepares and updates annually a three-year rolling strategy ("Strategy") setting out its goals and an operating plan for achieving this Strategy. This Strategy is discussed by the FMSB Standards Board (and may from time to time be discussed with the UK DMO, see below) but is formally approved by the FMSB Advisory Council.

### **Purpose and Scope of MoU**

10. The purpose of the MoU is to set out the expectations of the Parties.
11. The UK DMO may, at its discretion from time to time, where relevant to the UK DMO's functions and activities, provide feedback on any aspects of the goals and strategic planning for FMSB's work. With that in mind:
  - a. The FMSB CEO and/or the Secretariat may provide the UK DMO with a high-level update on the FMSB Strategy and its progress on the strategy at least annually.
  - b. The FMSB CEO and/or the Secretariat may also discuss the annual FMSB Strategy refresh with the UK DMO as it develops, with a particular focus on any aspects that may be of greater relevance or interest to the UK DMO.



12. The FMSB Secretariat shall provide the UK DMO with details about forthcoming drafts of FMSB's proposed Standards, Statements of Good Practice, and other publications. The FMSB Secretariat shall provide the UK DMO with copies of these draft documents upon the UK DMO's request, to give the UK DMO an opportunity to comment on them. The UK DMO may, from time to time and at its discretion, provide comments on any aspects of the drafts that it considers to be of particular relevance or interest, but is under no obligation to do so. Neither the provision of drafts to the UK DMO, nor the provision of, or failure to provide, any comments by the UK DMO shall constitute any implicit or explicit endorsement of the drafts or final publications. The FMSB Secretariat shall notify the UK DMO of all its publications, communications and events.
13. The UK DMO may, in its sole discretion, determine whether, and the extent to which, it will seek to incorporate any of the FMSB Standards and Statements of Good Practice into its own processes and operations where applicable and as appropriate; however the UK DMO is under no obligation to do so.
14. All FMSB Standards Board and Advisory Council meetings are divided into "Open" and "Closed" sessions. At "Closed" sessions only firms which are contractual members of FMSB participate. The UK DMO is not a member of FMSB. The FMSB Secretariat may invite the UK DMO to, and the UK DMO may in its sole discretion agree to, attend "Open" sessions as an observer from time to time, with a particular focus on any sessions related to topics that may be of greater relevance or interest to the UK DMO.

### **Confidentiality**

15. FMSB must ensure that any comments made by the UK DMO in relation to any draft publication or guidance material of FMSB are kept confidential, unless otherwise agreed in writing between the Parties. FMSB shall promptly notify the UK DMO in writing of requests from third parties for details of the UK DMO's comments that have been furnished under this MoU.

### **Status of MoU**

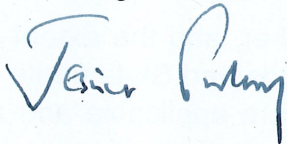
16. This MoU sets out the understanding between FMSB and the UK DMO and is intended to clarify the expectations of each Party. This MoU is personal to each Party and no third party may rely upon it. The Parties will use reasonable endeavours to meet the terms of this MoU, but this MoU is not legally binding and is not intended to create obligations enforceable by any Party. None of the Parties shall have any rights or remedies against the other in respect of any failure by any other Party to carry out its roles or responsibilities under or in accordance with this MoU.



**Maintenance and review of MoU**

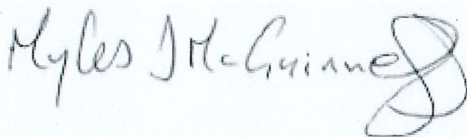
17. The Parties expect to continue to develop their strategic and working relationship over time. The Parties may agree to amend, and the UK DMO reserves the right to withdraw from, the arrangements set out in this MoU at any time.

Signed by Jessica Pulay  
Chief Executive Officer, on behalf of the  
United Kingdom Debt Management Office:



Date: 18 September 2025

Signed by Myles McGuinness  
Chief Executive Officer  
Financial Markets Standards Board Limited:



Date: 18 September 2025