2026 Workplan

August 2026 update

I. Introduction

This document sets out Financial Markets Standards Board (FMSB)'s proposed programme of work for H2 2026 across its five Committees and newly established Asset Manager and Owner forum. It provides an indicative view of the areas where FMSB expects to focus its efforts, recognising that priorities may evolve.

The workplan focuses on behaviour in wholesale financial markets and covers issues that may be conduct-related, market structural or operational in nature where these have the potential to affect market fairness or effectiveness.

The topics included in the workplan are intended to address one or more of the following thematic areas:

- identify and respond to emerging market threats or trends;
- reduce uncertainty and ambiguity in prevailing market practices;
- bridge gaps between regulation and evolving market practices or structures; and
- strengthen and promote the convergence of international market standards.

Sections II and III explain how this workplan has been developed and how it will be delivered. Section II sets out the principles and process by which FMSB identifies and prioritises topics for consideration. Section III describes the proposed programme of work for 2026, including ongoing initiatives, new work expected to commence in 2026 and potential topics.

II. Topic Selection

How does FMSB horizon scan?

Subject matter experts across FMSB's five Committees are responsible for horizon scanning and topic selection. These Committees are (i) Market Practices; (ii) Electronic Trading and Technology; (iii) Sustainable Finance; (iv) Conduct & Ethics; and (v) Market Infrastructure and Operations. Key sources informing the Committee horizon scanning process include:

- Practitioner dialogue
- Issues experienced by users of wholesale markets
- Dialogue with UK and international regulators and public authorities
- Engagement with broader industry stakeholders
- Consideration of emerging industry themes
- Our Future of financial markets report

Once a topic has been prioritised by a Committee and approved by the Standards Board, a Working Group, made up of subject matter experts from across the membership, is formed to debate and develop the materials.

How does FMSB decide its workplan?

From the list of potential topics identified through the horizon scanning process, topic selection is narrowed and prioritised taking into account factors including:

Relevance to mandate	Does the topic relate to: • Behaviour in wholesale markets (either of a conduct or operational nature) • Uncertainties and ambiguities in current market practices • Bridging the gap between regulation and market developments • Wholesale market threats or trends • Strengthening international market standards
Impact	• Materiality of the topic for financial market participants • Suitability of the topic for market standards or other FMSB outputs • Level of demand and relevance for end users • Geographic scope of the issue (local, regional, or global)
Role of FMSB	• Appropriateness of FMSB as the body to address the issue • Overlap with regulatory or other industry initiatives
Timing	• Timeliness of addressing the issue • Novelty and urgency of the topic
Complexity	• Likelihood of achieving sufficient market consensus • Competition law considerations and feasibility of mitigation

III. Workplan

FMSB Committee	Topic	Topic overview	Status
Market Practices	**Pre-hedging disclosure and consent**	Pre-hedging is where liquidity providers aim to hedge inventory risk in an anticipatory manner. With the release of IOSCO's Pre-Hedging Final Report, the Working Group are developing industry guidance on disclosure and consent (building on B2 and B3 of the IOSCO recommendations). The output will be an updated version of FMSB's Large Trades Standard consolidating the guidance in a single source and focusing on where the market impact and conduct considerations associated with pre-hedging are likely to be greatest.	**Publication H2 2026**
	Grey market trading	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. This Statement of Good Practice is intended to promote a common understanding of the purpose, benefits and risks associated with GMT across issuers, investors and market makers; and identify key considerations for syndicate banks prior to deciding to conduct grey market trading in different contexts.	**Published May 2026**
	Market quotation mechanisms	Certain derivative contracts rely on third-party dealers to exercise expert judgement and provide a valuation at a specific point in time, typically as a fallback where market data or bilateral agreement is unavailable. These market quotation mechanisms are widely used across asset classes and contexts, including close-outs, termination events, disrupted reference prices and collateral valuation. In practice, dealers are often reluctant to respond, given the absence of financial incentives and concerns around conduct, litigation and benchmark-related risk. This limits the reliability of market quotations as a valuation tool. FMSB is exploring whether behavioural guidance could support more consistent practice.	**Market Practices Committee meeting in Q4 to determine future focus**

FMSB Committee	Topic	Topic overview	Status
	New issuance swaps	In 2018, FMSB issued a Standard considering the conduct risks associated with risk management transactions for new issuances. Market practices around the pricing of new issuance swaps and associated anticipatory risk management approaches have evolved since 2018, potentially presenting novel conduct questions.	
	Price discovery	Price discovery refers to the process of establishing price or depth of liquidity in a product. This workstream would involve examining the distinction between genuine price discovery and potential illegitimate behaviours such as spoofing.	
Electronic Trading and Technology	**Market-facing applications of AI**	As highlighted in the Future of financial markets paper, AI is increasingly being adopted in trading and execution activities in wholesale markets. This Spotlight Review considers market-facing AI trading applications, distinguishing between more traditional and novel use cases, the potential risks these pose to firms, clients and markets as well as how firms may think about mitigating such risks. The Spotlight Review will be reviewed periodically as new use cases emerge.	**Published February 2026**
	Model risk management frameworks	In 2024, FMSB published a Statement of Good Practice on model risk management frameworks for electronic trading algorithms. This workstream will consider updates to the 2024 guidance to reflect more extensive use of AI across model development and deployment in an e-trading context and to support appropriate management of existing and new risks.	**Working Group formed**
	Venues and Platforms	Potential workstream on execution platform management and governance with the aim of mitigating inefficiencies and inconsistencies that could contribute to potential operational and conduct risks.	**Working Group H2 2026**
Sustainable Finance	**Horizon scanning**	Ongoing horizon scanning to determine potential areas of future focus.	**Ongoing**

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Conduct & Ethics	**Non-financial risk**	Non-financial risk describes the set of enterprise-wide risks that remain after separating out financial risk. The key value of the NFR lens is the ability to consider these risks holistically, understand how they interact, and support coherent decision-making and accountability across the organisation. This Spotlight Review examines how NFR is managed in practice, where common challenges remain, and the characteristics associated with more effective approaches.	**Published August 2026**
Market Infrastructure and Operations	**Client onboarding**	This Standard streamlines the data points, documents and sources which are acceptable to populate such data points, for the purpose of standard KYC under the UK regulatory framework.	**Publication of country sheets February 2026**
	Standard settlement instructions	This Standard codifies existing best practice for the sharing of SSIs, in particular, the use of pre-authenticated solutions which allow for automation and introduces new manual templates consistent with ISO20022 for use where such automation is not legally or operationally feasible.	**Updated templates published June 2026**
	Digital Identity	This Working Group is considering the technological attributes required to prove provenance (digital ID) as well as the data elements (digital passport) which may be commonly needed to be demonstrated, for selected use cases in the post-trade area.	**Ongoing**
	Due diligence questionnaire for cyber risk	Firms are required to conduct due diligence on their critical third parties, including in relation to cyber risk. This has led to a proliferation of cyber-related questionnaires being issued to third parties and financial market infrastructure providers, often with differing content and formats. As a result, responding can be time-consuming and challenging. Greater standardisation of such questionnaires could improve efficiency and consistency for both requesting and responding firms.	**Potential workstream**

FMSB Committee	Topic	Topic overview	Status
	Tokenisation	Workstream comparing current and potential future flows under a tokenised ecosystem for the purpose of settlement. The workstream will also consider potential gaps in market practice that emerge for this use case in both a fully tokenised world, and a hybrid one where "traditional" settlement coexists alongside.	**Potential workstream**

FMSB Committee	Topic	Topic Overview	Status
	Asset Manager and Owner forum	FMSB is establishing dedicated asset manager and owner focus sessions to: • Provide asset manager and owner Members with a forum to raise potential topics for consideration by FMSB Committees; • Enable FMSB Committees or Working Groups to engage with asset manager and owner Members to obtain feedback relevant to their work; and • Allow asset manager and owner firms to develop common positions in an asset manager and owner-only forum. The forum has met twice since inception has provided input into the FMSB pre-hedging and Non-Financial Risk (NFR) workstreams.	**Launched in March 2026 – ongoing**
	Future of financial markets: Ten Trends	Building on last year's Future of financial markets publication, this paper considers the ten biggest trends in wholesale markets based on data and expert analysis and what they may mean for market fairness and effectiveness.	**Q4 2026**

Indicates updates from January 2026