



# **Guide to submitting a Person Discharging Managerial Responsibilities (PDMR) and persons closely associated with them notification via the FCA website**

December 2025

## When to submit a PDMR form

A Person Discharging Managerial Responsibilities (PDMR) of an issuer or an emission allowance market participant (EAMP), and those that are closely associated with them are required to:

- Notify the FCA of every transaction that has been conducted on their own account relating to the shares or debt instruments, derivatives or other financial instruments linked to that issuer or EAMP. This applies to transactions once the total amount of EUR 5,000 has been reached within a calendar year.
- Provide these notifications no later than three business days after the date of the transaction.

These notifications can be made by completing the PDMR form which can be accessed on the FCA website. As part of our work to improve processes and data quality, we have updated the form (November 2025) to include enhancements to our validation rules and a change to the order in which information is entered. These improvements are designed to make the form easier and quicker for submitters to complete, reduce errors and, ensure greater consistency in the information we receive.

References to ESS on the PDMR form relates to the FCA records held on the Electronic Submission System used to validate the information provided to us.

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To create a PDMR form, navigate to the PDMR form landing page from the FCA website and:

- Enter your email address (note that your email address will be validated when you submit the form – see below)



**Persons Discharging Managerial Responsibilities and persons closely associated with them notification**

| Notice Name   | Notice Text   | Contact Email  |
|---------------|---|----------------|
| Support Email | If you have any issues using this form, please email the PMU team   | pmu@fca.org.uk |
| Web browsers  | Support for the IE11 Internet browser has ended. While customers using IE11 are not blocked from accessing this platform, features are not guaranteed to work correctly. Please consider upgrading to ensure that our platform works as intended. We recommend using Chrome or Microsoft Edge Chromium. |                |

The EU Market Abuse Regulation (EU MAR) came into effect on 3 July 2016 and was enshrined into UK law on 31 December 2020 by the European Union (Withdrawal) Act 2018. Changes to EU MAR were made by the Market Abuse Exit Regulations 2019, to ensure that the onshored legislation (UK MAR) operates effectively in the UK. The EU MAR implementation measures for UK MAR were introduced on 31 December 2020 by the EU (Withdrawal) Act 2018 and were amended by FCA 2019/45 (changes to our Handbook were made by FCA 2019/23 in relation to the Market Conduct Sourcebook, and by FCA 2019/26 in relation to the Disclosure Guidance and Transparency Rules).

This form is for the use of persons discharging managerial responsibilities (PDMRs) as well as persons closely associated with them to notify transactions to the FCA under Article 19(1) of UK MAR.

The form provided in this system constitutes the "secure means of transmission" mandated in Article 2 of Regulation (EU) 2016/523 as onshored and amended by FCA 2019/45. PDMRs as well as persons closely associated with them are required to use this form when submitting a notification under this article.

Once this form is completed, submitters will be sent an automatic acknowledgement and the submitter will be required to click on a link to validate their email address. This link is valid for 3 working days. In the event that the submitter fails to confirm within this time, they will be sent another email with a new link for confirmation.

Email Address  Please provide valid email address

**Access PDMR Notification**

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- Click the **Access PDMR Notification** button.

The form is split into 4 sections:

- Section 1 - Details of the issuer or emission allowance market participant<sup>1</sup>
- Section 2 - Reason for the notification
- Section 3 – Details of the person discharging managerial responsibilities / person closely associated.
- Section 4 - Details of the transaction(s)

**Mandatory fields are denoted by an \***

<sup>1</sup> Emission market participants have been subject to these requirements from 3 January 2018

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# Section 1 – Details of the issuer or emission allowance market participant

**1 – Details of the issuer or emission allowance market participant**

|                              |                      |   |
|------------------------------|----------------------|---|
| Full name of the entity *    | <input type="text"/> | <a href="#">Click here for Issuer</a>                 |
| Legal Entity Identifier code | <input type="text"/> | <small>In accordance with ISO 17442 LEI code.</small> |

On this screen you can enter the Legal Entity Identifier code (or LEI), a unique 20 character code that identifies distinct legal entities that engage in financial transactions. (Note that, although we would prefer you include this information, it is not mandatory).

To add the name of the entity (or Issuer) click on the button which will bring up the following:

**1 – Details of the issuer or emission allowance market participant**

|                              |                      |                                       |
|------------------------------|----------------------|---------------------------------------|
| Full name of the entity *    | <input type="text"/> | <a href="#">Click here for Issuer</a> |
| Legal Entity Identifier code | <input type="text"/> | <a href="#">X</a>                     |

**2 – Reason for the notification**

**For persons discharging managerial responsibilities**  
- The position occupied within the firm  
**For persons closely associated with the firm**  
- An indication that the notification relates to a person closely associated with the firm  
- Name and position of the relevant person

Position/status \*

Initial notification/amendment

**3 – Details of the person discharging managerial responsibilities**

Must complete either for a natural person or a legal person. If completing for a legal person, please include the legal form as provided for in the register where it is incorporated, if applicable.

**Get Issuer Name**

To maintain accurate organisation data, select to search ESS records by Organisation Name or LEI

**Select Search Criteria**

--None--

--None--

Organisation Name

LEI

**Proceed**

This will allow our system to check if the Issuer exists on the FCA's records (most organisations will already be recorded in our records) and if found, and selected, will auto-populate the form for you.

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There are two Search Criteria to obtain the name as follows:

- By Organisation Name (partial or full name of the Issuer).
- Or if you know the LEI (Legal Entity Identifier), you can also use the dropdown to select LEI and proceed.

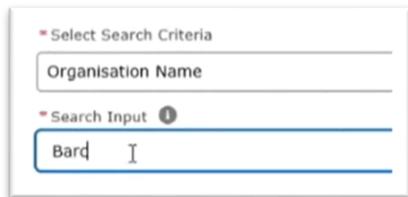
To search by Organisation Name simply select that from the Search Criteria and enter at least 4 characters from the name – see below for example – and then press proceed. You do not need to enter the full name of the company – just a few characters is enough.

\* Select Search Criteria

Organisation Name

\* Search Input ⓘ

Bard



Alternatively, to search by LEI simply select that from the Search Criteria and enter the LEI – and then press proceed

Get Issuer Name

To maintain accurate organisation data, select to search ESS records by Organisation Name or LEI

\* Select Search Criteria

LEI



\* Search Input ⓘ

I



Proceed

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Either search will bring up data matching the search criteria. If the appropriate Organisation is presented then simply select the box, press proceed and continue to Section 2 of this guide.

Get Issuer Name

The search has returned the following matches on ESS based on your Search. Please select the relevant Organisation or search via GLEIF below if the required organisation is not present

|   |   |                      |   |
|---|---|----------------------|---|
| 1 of 1 item • 0 items selected                        |   |                      |   |
| <input type="checkbox"/> Organisation Name            | ▼ | LEI Identifier       | ▼ |
| <input type="checkbox"/> HSBC PB SERVICES (SUISSE) SA |   | 213800XJ6QQ7HBW8X320 |   |

OR

If the organisation is not found on ESS, please click to search the GLEIF register

GLEIF Integration  Active



[Previous](#) [Proceed](#)

**Second Search stage:** If the name that you are looking for is not found via the search above then toggle “**GLEIF Integration**” and click proceed and a search in the GLEIF database will occur.

You will now see all the associated GLEIF register searches, scroll to find your correct Organisation, tick the box to select, then press proceed. This will auto-populate the form and you can move to Section 2 of this guide.

Get Issuer Name

GLEIF Register Search Results

200 of 200 items • 0 items selected

| <input type="checkbox"/> Organisation ...              | LEI Identifier         | Registered Ad... ▾   | Registered Ad... ▾ | Registered Ad... ▾ | Registered Ad... ▾ |
|--|------------------------|--|--------------------|--------------------|--------------------|
| <input type="checkbox"/> HSBC FUNDS - HSBC GROWTH FUND | 2138009HRTTP7FS C8954  | C/O HSBC FUNDS, P.O. BOX 182845                                | COLUMBUS, OHIO     | US                 | 43218-2845         |
| <input type="checkbox"/> HSBC FUNDS                    | 213800JVHAGFQY Z50120  | 230 PARK AVENUE  | NEW YORK           | US                 | 10169              |
| <input type="checkbox"/> HSBC PORTFOLIOS               | 213800NZU1QJLUS IGMZ93 | 4, RUE PETERNELCHEN  | LUXEMBOURG         | LU                 | L-2370             |
| <input type="checkbox"/> HSBC OPENFUNDS                | 213800RCNCWFCY VB7241  | C/O HSBC GLOBAL ASSET MANAGEMENT (UK) LIMITED, 8 CANADA SQUARE | LONDON             | GB                 | E14 5HQ            |
| <input type="checkbox"/> HSBC                          | 96950083WFZCU3         | 110 ESP DU GENERAL DE COLIBRIVATE                              | FD                 | Q3A00              |                    |

OR

No Match Found/I couldn't find my Firm name  Active

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**Final stage:** If the Issuer's name is not identified by either of the preceding steps, please select the 'no match found' and press Proceed.

### Get Issuer Name

Gleif Search does not return any results for the entered Organisation Name/LEI

No Match Found/I couldn't find my Firm name  Active

[Previous](#)

[Proceed](#)

Enter the full Organisation Name in the screen below, and complete and press Proceed to move to Section 2.

### Get Issuer Name

\* Please enter the Organisation Name

Test HSBC Is

[Previous](#)

[Proceed](#)

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# Section 2 – Reason for the notification

Complete the Position/status box to show the position or status of the PDMR within the issuer/Emission admission Market Participant (EAMP)

If the notification relates to a person closely associated with a PDMR, in the Position/status box add:

- An indication that the notification concerns a person closely associated with the PDMR, and
- The name and position of the relevant PDMR
- In the “Initial notification/amendment” dropdown box indicate whether the notification is an initial notification or an amendment to a prior notification. For an amendment, enter:
  - the previous notification reference number, and
  - explain the error that the current notification amends in the freeform box below

(You can find the previous notification reference number in the confirmation email received when the original PDMR notification was submitted)

### 2 – Reason for the notification

#### For persons discharging managerial responsibilities:

- The position occupied within the issuer or emission allowance market participant should be indicated e.g. CEO, CFO.

#### For persons closely associated with:

- An indication that the notification concerns a person closely associated with a person discharging managerial responsibilities;  
- Name and position of the relevant person discharging managerial responsibilities

Position/status \*

Director

Initial notification/amendment \*

[Please Select]

[Please Select]

Initial Notification

Amendment to prior notifications

### 3 – Details of the person discharging managerial responsibilities / person closely associated with

Must complete either for a natural person or a legal person. If completing for a legal person, enter the name of the legal person in the box below or in the register

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### 2 - Reason for the notification

#### For persons discharging managerial responsibilities:

- The position occupied within the issuer or emission allowance market participant should be indicated e.g. CEO, CFO.

#### For persons closely associated with:

- An indication that the notification concerns a person closely associated with a person discharging managerial responsibilities;  
- Name and position of the relevant person discharging managerial responsibilities

Position/status \*

Director

Initial notification/amendment \*

Amendment to prior notifications

Previous notification reference number \*

Explain the error that this notification is amending \*

Max of 500 characters.

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# Section 3 – Details of the person discharging managerial responsibilities / person closely associated

Select the dropdown for submission for PDMR OR Submission for PCA to a PDMR

### 3 - Details of the person discharging managerial responsibilities / person closely associated

Must complete either for a natural person or a legal person. If completing for a legal person, please include the legal form as provided for in the register where it is incorporated, if applicable.

Is this a PDMR or PCA Submission \*

Submission for PDMR

Name of natural person \*

First Name(s)

Last Name(s)

I

OR

Legal person \*

Full name including legal form as provided for in the register where it is incorporated, if applicable.

[Redacted]

Enter the name of the natural or legal person as applicable.

### 3 - Details of the person discharging managerial responsibilities / person closely associated

Must complete either for a natural person or a legal person. If completing for a legal person, please include the legal form as provided for in the register where it is incorporated, if applicable.

Is this a PDMR or PCA Submission \*

Submission for PDMR

Name of natural person \*

[Please Select]

Name(s)

Submission for PDMR

Submission for PCA to a PDMR

Legal person \*

OR

Full name including legal form as provided for in the register where it is incorporated, if applicable.

[Redacted]

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# Section 4 – Details of the transaction(s)

Click Add Transaction to enter the details of the transaction.

Note that more than one transaction can be reported in the same notification. If there are multiple transactions, you will need to click Add Transaction each time any of the following differ:

- type of instrument
- nature of transaction
- date
- place where transactions were conducted
- currency of the trade

When only the price and volume differ, you can enter these as further lines on one transaction.

### 4 - Details of the transaction(s)

*Details of the transaction(s): section to be repeated for (i) each type of instrument; (ii) each type of transaction; (iii) each date; and (iv) each place where transactions have been conducted*

[Add Transaction\(s\)](#)

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### Add details of the transaction

The user will need to enter in all mandatory fields as specified below;

**Add Transaction(s)**

Mandatory fields are denoted by an \*

Description of Instrument \*

Identification Code \*

Nature of the transaction \*

Currency \*

Price(s) and Volume(s) \* 

|        | Price | Volume | Total |
|--------|-------|--------|-------|
| Remove | 0     | 0      | 0.00  |

**Add Price & Volume**

Where more than one transaction of the same nature (purchases, sales, lendings, borrowings) on the same financial instrument or otherwise allowance are executed on the same day and on the same place of transaction, prices and volumes of these transactions shall be reported in this field, in a two columns form as presented above.

In the Description of Instrument field, use the picklist to indicate the type of instrument or select “other” if the instrument is not on the list.

**Add Transaction(s)**

Mandatory fields are denoted by an \*

Description of Instrument \*

Identification Code \*

Nature of the transaction \*

Currency \*

Price(s) and Volume(s) \* 

|        | Price | Volume | Total |
|--------|-------|--------|-------|
| Remove | 0     | 0      | 0.00  |

**Add Price & Volume**

Where more than one transaction of the same nature (purchases, sales, lendings, borrowings) on the same financial instrument or otherwise allowance are executed on the same day and on the same place of transaction, prices and volumes of these transactions shall be reported in this field, in a two columns form as presented above.

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If you select 'Other' you will be prompted to give a description of 'Other Instrument'

**Add Transaction(s)**

*Mandatory fields are denoted by an \**

|                                   |   |
|-----------------------------------|---|
| Description of Instrument *       | <input type="text" value="Other"/>       |
| Description of Other Instrument * | <input type="text" value="test other"/>  |

Max of 255 characters

In the Identification Code box provide the International Securities Identification Number (ISIN) of the relevant Instrument

In the Nature of the transaction box describe the type of transaction. Please provide a detailed description – transactions may include:

- purchases or sales of shares, debt instruments, derivative or other financial instrument linked to the underlying share or debt instrument.
- transactions conducted on your own account relating to emission allowances and auction products or associated derivatives (for emission allowance market participants)
- pledging or lending of financial instruments;
- transactions made under a life insurance policy referred to in Article 2(3)(a) of Directive 2009/138/EC where;
  - the policy holder is a PDMR or person closely associated with a PDMR;
  - the investment risk is borne by the policyholder;
  - the policy holder has the power or discretion to make investment decisions regarding specific instruments in that life insurance policy or to execute transactions regarding specific instruments for that life insurance policy.

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Also indicate whether the transaction is linked to the exercise of a share option programme or employee share plan. For employee share award transactions (including grant/vesting/exercise of employee share awards), the instrument is the underlying share.

In the Currency box state what currency the transaction was executed in.

### Add price and volumes

Where more than one transaction of the same nature (purchases, sales, lending, borrowing, ...) has been executed on the same financial instrument or emission allowance on the same day, in the same currency and on the same place of transaction, report their prices and volumes in the Price(s) and Volume(s) table.

In the table you can insert up to 20 lines.

For transactions made at nil consideration (e.g. on gifts, grant or award), the price must be reported as '0'. In the case of options granted, the exercise price should not be reported as the price and the volume should be the number of shares being placed under award not the number of awards.

Price(s) and Volume(s)

|                        | Price | Volume | Total |
|------------------------|-------|--------|-------|
| <a href="#">Remove</a> | 0     | 0      | 0.00  |

[Add Price & Volume](#)

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### Add aggregated price volumes and complete the remaining transaction details

The form will automatically calculate aggregated volume and the weighted average price in the Aggregated Information box.

In Date of the transaction provide the date of the execution of the notified transaction. This should be given in the Coordinated Universal Time (UTC). (Please avoid entering a future date as the system will not register a transaction where this is the case).

In Place of the transaction give the:

- Name and code to identify the UK trading venue or EU trading venue,
- systematic internaliser, or
- organised trading platform outside of the UK where the transaction was executed

If the transaction was not executed on any of the above venues, state outside a trading venue.

Date of transaction \*

*Data of the particular day of execution of the notified transaction.  
Using the ISO 8601 date format: YYYY-MM-DD; Date of trade in UTC  
time*

Place of transaction \*

*Name and code to identify the UK trading venue or EU trading venue,  
the systematic internaliser or the organised trading platform outside of  
the UK where the transaction was executed as defined under delegated  
acts Commission Delegated Regulation (EU) 2017/590 supplementing  
Regulation (EU) No 600/2014 of the European Parliament and of the  
Council with regard to regulatory technical standards for the reporting  
of transactions to competent authorities adopted under Article 26 of  
Regulation (EU) No 600/2014, or if the transaction was not executed  
on any of the above mentioned venues, please mention "outside a  
trading venue"*

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## Additional information

If you need to add additional information, add it in the field

**Details of the transaction(s)**

*(all of the transaction(s): section to be repeated for (i) each type of instrument; (ii) each type of transaction; (iii) each date; and (iv) each place where transactions have been conducted)*

**Add Transaction(s)**

**transaction(s) summary table**

| View/Edit                 | Date       | Description of Instrument                                   | Description of Instrument                                   | Description of Other Instrument | Aggregated Price | Aggregated Volume | Total Aggregated Price |
|---------------------------|------------|---|---|---------------------------------|------------------|-------------------|------------------------|
| <a href="#">View/Edit</a> | 2025-11-04 | Financial instrument linked to a share or a debt instrument | Financial instrument linked to a share or a debt instrument |                                 | 100.00           | 25                | 2500.00                |

**Additional Information**

Additional details - Financial instrument linked to a share or a debt instrument

[< Edit back](#) [Next page >](#)

Select next page to access the review and submit page



## Persons Discharging Managerial Responsibilities and persons closely associated with them notification

**Review Form and Submit**

**1 - Details of the issuer or emission allowance market participant**

**Please review the information you provided in the form**

Full name of the entity \*

Legal Entity Identifier code   
In accordance with ISO 17442 LEI code.

**2 - Reason for the notification**

**For persons discharging managerial responsibilities:**  
- The position occupied within the issuer or emission allowance market participant should be indicated e.g. CEO, CFO.

**For persons closely associated with:**  
- An indication that the notification concerns a person closely associated with a person discharging managerial responsibilities;  
- Name and position of the relevant person discharging managerial responsibilities

Position/status \*

Initial notification/amendment

**3 - Details of the person discharging managerial responsibilities / person closely associated**

Must complete either for a natural person or a legal person. If completing for a legal person, please include the legal form as provided for in the register where it is incorporated, if applicable.

Is this a PDMR or PCA Submission \*

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# Review, Submit and print the notification

Once you have added all the transactions you can review the submission by clicking on the [Next page >](#) button.

Review Form and Submit

i Please review the information you provided in the form

This will display a page of all the data entered onto the form.

- To amend your form, click on the [Edit back](#) button.
- To submit your form, click on the “I’m not a robot” reCAPTCHA box



In certain circumstances, for example where you have submitted several notifications within a short period of time, you will be requested to complete a more advanced level of verification. You will be asked to click on certain pictures to complete the verification.



Click the [Submit to \[team\]](#) button to send the notification to a team within the FCA.



### Thank you for your submission

Thank you for your submission.

If you need to amend a previously submitted notification at a later date, please submit a new notification choosing the dropdown "Amendment to prior notifications" giving the previous notification reference number and include an explanation of what you are amending.

If we require any further information, we will contact you.

For further information regarding the FCA's market abuse regime, please consult our webpage at <https://www.fca.org.uk/markets/market-abuse/regulation>.



On the submission page, you will be given an option to save or print the notification.

Click on the disk icon to save or print the notification

To assist you in meeting your record keeping obligations, a pdf copy of this notification may be downloaded here. Please note that for security reasons this will not be accessible once this window is closed.



***We recommend that you save and print your notifications for your own records.***

### Verification Email

Thank you for completing your PDMR and persons closely associated with them notification. Please click on the following link to confirm your email address

[Verify email address](#)

No further action is required from you after performing this task.

Regards,  
Financial Conduct Authority

We will send an email to the email address you provided on the form. Click on the "Verify email address" link included in our email to ensure that the FCA has a valid contact email address should we wish to make an enquiry regarding the notification.