

Ms Mandy Gradden  
Chair, Listing Authority Advisory Panel

Via email

10 April 2024

Dear Mandy

**FCA ENGAGEMENT WITH THE LISTING AUTHORITY ADVISORY  
PANEL (LAAP) 2024/25**

Firstly, we would like to thank you for LAAP's ongoing support for and challenge to the FCA, and, on a more personal note, for your time and effort steering the Panel since you were appointed as Chair last summer. We value enormously the contributions from all our Statutory Panels, which help us deliver better outcomes for consumers, firms, and markets.

In the current environment we are, now more than ever, cognisant of the FCA's need to prioritise and focus its resources and efforts where they will have the biggest impacts. And in light of the Financial Services and Markets Act passed last year, and of our own strategy, business plan and workload, both the Board and ExCo have been reflecting on how the FCA can get the most valuable input from all of its Panels.

A central purpose of this letter is therefore to set out the areas that the FCA expects to prioritise when engaging with LAAP in the year ahead. We also wish to share with you our views on other relevant matters, such as the Board's interaction with the Panel and with you as Chair.

We are also writing in similar terms to the Chairs of our other statutory Panels.

**Prioritisation**

At a high level, and subject of course to unforeseen events, the Board and ExCo wish to prioritise engagement with you on the following FCA policy and operational areas:

- **Primary market effectiveness** including implementation of listing reforms

- Delivering the new secondary **international competitiveness and growth** objective in support of our existing primary objectives
- Developing a **strategic vision for UK capital markets** and coordination between UK authorities, regulators and industry to deliver sustainable growth - noting the implications of potential audit reforms
- **Capital and funding** including access to capital and investment research/standards across public and private markets
- **MAR** Review
- Developing a “primary market cleanliness” metric and **measuring the impact of our work** more generally (including post-implementation review of policy interventions)
- **Disclosure** including ESG, financial reporting requirements for issuers especially implementation of international sustainability standards/stewardship and assurance and other material disclosure
- **Public offer and admission to trading regimes**

In doing so, we ask LAAP to operate, as always, as a “critical friend” to the FCA, providing advice and constructive challenge on current and future reform – whether through regulatory reform or policy development or changes to the ways in which the FCA operates. We will endeavour to engage with you from an early stage in our work wherever possible, to help inform our thinking before we consult more widely.

We ask LAAP – and will ask our own teams also – to test the impact of our initiatives and processes across primary market participants, including how measures are landing, and to engage on potential and emerging implementation challenges. On matters of significant reform we welcome your views on how we can best engage with external stakeholders and any needs of different target audiences.

We would welcome your input on cross-sector issues from across the whole Panel; and on more sector-specific issues from a sub-group of members with more directly relevant expertise, including, where appropriate, from across different panels.

In all of this we fully recognise that you, as a Panel which has an independent voice, will also have your own priorities on which you will want to engage with the FCA, even if there is overlap between the two lists.

We will use these lists to prioritise the issues on which we engage with the panel. However, where there is capacity to do so, we would also value your input on other relevant issues, as appropriate. The Secretariat, together with Clare Cole as Panel sponsor director and your other key FCA

stakeholders, will of course continue to support your engagement with relevant FCA teams, as part of the wider support it provides.

### **Engagement with ExCo and the Board**

We expect that LAAP will continue to have access to and engage regularly with the FCA Chair, Board, Chief Executive and senior executives of the FCA, in line with the terms of reference agreed by the Board. We ask that you continue to submit a regular "Report to the Board" (which will also be considered by ExCo), and that this should focus on the two or three most important strategic themes that you wish to bring to the Board's attention. We will continue to have periodic Board lunches with the Panel Chairs, and see your annual report ahead of publication. And a member of ExCo will continue to endeavour to attend your formal meetings.

In addition, we propose to formalise an annual meeting between the FCA Chair and each of the Panel Chairs, one-to-one, to discuss the work of the Panel. This will be an opportunity to reflect on the previous year's interaction between LAAP and the FCA, informed by the Board's engagement as outlined above and any Panel effectiveness reviews conducted either by the Panel or the FCA during the year.

### **Looking forward**

We hope that you find this letter helpful in setting out, albeit rather formally, our expectations for our engagement with one another over the coming year, 2024-25. We look forward to continuing the constructive dialogue and close working relationships that we have built up over previous years.

Yours sincerely

**Ashley Alder**  
FCA Chair

**Nikhil Rathi**  
FCA Chief Executive