

Guide to submitting a notification of delayed disclosure of inside information via the FCA website

December 2025

When to submit a notification of delayed disclosure of inside information form

An issuer, or an emission allowance market participant (EAMP), may delay disclosure of inside information to the public provided that the delay meets the following conditions:

- Immediate disclosure is likely to prejudice its legitimate interests
- Any delay in disclosing information is unlikely to mislead the public, and
- it is able to ensure the confidentiality of that information.

Where disclosure of inside information was delayed, immediately after disclosure of such information you must inform the FCA that the disclosure was delayed. You must do this by completing the delayed disclosure notification form, which can be accessed from the FCA website.

You can submit this form using any of the following browsers: Chrome, Firefox, Safari, IE. To ensure all features are displayed properly on your screen we recommend you check that you are using any of the two most recent browser versions.

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

Create a notification of delayed disclosure of inside information form



Notification of Delayed Disclosure of Inside Information

Notice Name	Notice Text
	<p>The <u>EU Market Abuse Regulation (EU MAR)</u> came into effect on 3 July 2016 and was onshored into UK law on 31 December 2020 by the <u>European Union (Withdrawal) Act 2018</u>. Changes to EU MAR were made by the <u>Market Abuse Exit Regulations 2019</u>, to ensure that the onshored legislation (UK MAR) operates effectively in the UK.</p> <p>The EU implementing measures for EU MAR were also onshored into UK law on 31 December 2020 by the EU (Withdrawal) Act 2018 and were amended by <u>FCA 2019/45</u>. Changes to our Handbook were made by <u>FCA 2019/23</u> in relation to the Market Conduct Sourcebook, and by <u>FCA 2019/26</u> in relation to the Disclosure Guidance and Transparency Rules.</p> <p>This form is for the use of an issuer or an emission allowance market participant (EAMP) that wishes to notify the FCA that it has delayed a publication of inside information under Article 17(4) of UK MAR.</p> <p>Once the form is completed, submitters will be sent an automated 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.</p> <p>EAMP should choose to complete the 'Delayed Disclosure of Inside Information notification for EAMP' from the drop-down list below.</p> <div> <div>Delayed Disclosure of Inside Information notification</div> <div> --None-- Delayed Disclosure of Inside Information notification Delayed Disclosure of Inside Information notification for EAMP </div> </div>

Click on the Access Delayed Disclosure Notification button to create a Notification of Delayed Disclosure of Inside Information form.

The form is split into 6 sections:

- Section 1 - Identity of the issuer or EAMP
- Section 2 - Identify of the person making the notification
- Section 3 - Contact details of the person making the notification
- Section 4 - Identification of the publicly disclosed inside information that was subject to delayed disclosure
- Section 5 - Date and time of the decision to delay the disclosure of inside information
- Section 6 - Identity of all persons with responsibilities for the decision of delaying the public disclosure of inside information

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 *

Click here for Issuer

Legal Entity Identifier code

In accordance with ISO 17442 LEI code.

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 *

Click here for Issuer

Legal Entity Identifier code

2 - Reason for the notification

For persons discharging managerial responsibilities

- The position occupied within the issuer

For persons closely associated with the issuer

- An indication that the notification is submitted by a person who is not the issuer

- Name and position of the relevant person

Position/status *

Initial notification/amendment

3 - Details of the person disclosing the information

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 an

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

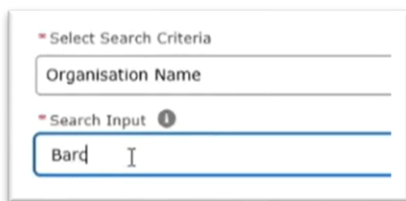
This will allow our system to check if the Issuer exists on the FCA’s records (most organisations will already be recorded in our records) and if found, and selected, will auto-populate the form for you.

4

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

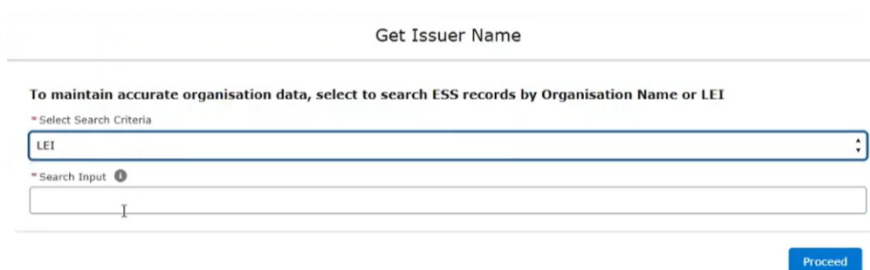
- By Organisation Name (partial or full name of the Issuer).
- Or if you know the LEI (Legal Entity Identifier), you can also use the dropdown to select LEI and proceed.

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.



A screenshot of a web form titled "Select Search Criteria". It features a dropdown menu with "Organisation Name" selected. Below this is a "Search Input" field with a blue border and an information icon, containing the text "Bard".

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



A screenshot of a web form titled "Get Issuer Name". It includes a heading "To maintain accurate organisation data, select to search ESS records by Organisation Name or LEI". Below this is a "Select Search Criteria" dropdown menu with "LEI" selected. Underneath is a "Search Input" field with a blue border and an information icon, which is currently empty. A blue "Proceed" button is located at the bottom right of the form.

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	2138009HRTTP7F5CB954	C/O HSBC FUNDS, P.O. BOX 182845	COLUMBUS, OHIO	US	43218-2845
<input type="checkbox"/> HSBC FUNDS	213800JYHAGFY Z5O120	230 PARK AVENUE	NEW YORK	US	10169
<input type="checkbox"/> HSBC PORTFOLIOS	213800NZUQLUS IGM293	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	COLOGNE/VITE	FD	03400

OR

No Match Found! couldn't find my Firm name

Inactive

6

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

Glief 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 Id

Previous

Proceed

Section 2 – Identity of the person making the notification

2 - Identity of the person making the notification

Name of natural person *

First Name(s)

Last Name(s)

Position within the issuer/EAMP *

Enter your name and your position within the issuer or EAMP.

Section 3 – contact details of the person making the notification

Enter your professional email address and contact phone number. (Note that your email address will be validated when you submit the form – see below)

3 - Contact details of the person making the notification

Professional email address *

Confirm Email Address *

Contact phone number *

Section 4 – identification of the publicly disclosed inside information that was subject to delayed disclosure

Complete the following fields:

- Title of the disclosure statement
- Reference number (if a reference number is available)
- Date of the announcement (via a pick list), and
- Time of the announcement in 24 hour format and the time zone

4 - Identification of the publicly disclosed inside information that was subject to delayed disclosure

Title of the disclosure statement *	<input type="text"/>
Reference number	<div>Please include the reference number when the dissemination system used assigns one</div> <input type="text"/>
Date of announcement *	<input type="text"/>
Time of the announcement *	<div>Time validation in 24 hour format - HH:MM</div> <div><input type="text"/> (GMT+00:00) Greenwich Mean Time (Europe/London) ▼</div>

Section 5 – date and time of the decision to delay the disclosure of inside information

Complete the date and time (including time zone) when the issuer or EAMP took the decision to delay disclosure.

5 - Date and time of the decision to delay the disclosure of inside information

Date of the decision *	<input type="text"/>
Time of the decision *	<div>Time validation in 24 hour format - HH:MM</div> <div><input type="text"/> (GMT+00:00) Greenwich Mean Time (Europe/London) ▼</div>

Section 6 – identity of all persons with responsibilities for the decision of delaying the public disclosure of the inside information

Provide details of all persons with responsibilities for the decision to delay the public disclosure of inside information.

- Where multiple names are entered, each individual's name should be separated by a semi colon.
- Where such decision was taken by a decision making body within the issuer or EAMP (e.g. The Board), it is acceptable for you to identify the body rather than providing the names of all members.

6 - Identity of all persons with responsibilities for the decision of delaying the public disclosure of the inside information

Please give details of all persons (separated by a semicolon) or the body within the issuer/EAMP (e.g. the Board) responsible for the decision

Review, Submit and print the notification

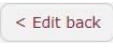
Once you have submitted all the information click on the

Next page >

Review Form and Submit

 Please review the information you provided in the form

You can:

- Review all the information you have entered into the form
- Edit any information by clicking on the  button.

Submit your notification form by clicking on the “I’m not a robot” reCAPTCHA box

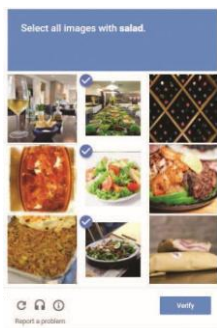
☐ I'm not a robot


reCAPTCHA
[Privacy](#) - [Terms](#)

Financial Conduct Authority

Guide to submitting a notification of delayed disclosure of inside information via the FCA website

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 on the **Submit to FCA** button to submit your notification to the FCA.

On the submission page you will be given an option to save and print your notification.

Click on the disk icon to save or print your notification.

After clicking on **Submit to FCA** the following page will be displayed with an option to save and print the notification for the user's records.

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 all your notifications.

Verification Email

Thank you for completing your delayed disclosure of inside information 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 confirm that FCA has your correct email address if we need to make an enquiry regarding your notification.

