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ALERT MEMORANDUM

Closing the Gap: FCA Eases UK IPO Research Rules

August 10, 2026

On August 5, 2026, the Financial Conduct Authority (FCA) published Policy Statement PS26/16, *Changes to information flows for UK equity IPOs*, removing two significant regulatory requirements that had governed analyst research in UK IPO transactions since 2018. The final rules came into force immediately on publication, with no transitional period. The reforms aim to shorten the UK IPO timetable, reduce execution risk, and bring the UK in line with international peers – most notably New York – as part of the FCA's ongoing efforts to enhance the competitiveness of UK capital markets.

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The key changes are:

- **Removal of the waiting period** (previously one or seven days) between publication of an approved prospectus or registration document and publication of connected research; and
- **Elimination of the unconnected analyst regime**, which required syndicate banks to offer unconnected analysts the opportunity to join issuer communications or receive identical information, together with all associated assessment, opinion-forming and five-year record-keeping obligations.

The FCA also flagged two areas for potential future reform:

- The requirement to publish an approved prospectus or registration document before connected research is published.
- The prohibition on engagement by analysts with issuers while their firm is in the process of pitching for a mandate.

The FCA indicated it will consider both issues in future policy work.

I. Key Changes

Removal of the Research Waiting Period. COBS 11A.1.4FR previously required a one-day waiting period (where unconnected analysts were given the opportunity to join issuer communications) or a seven-day waiting period (in all other cases) between publication of the approved prospectus or registration document and publication of connected research. In practice, the seven-day period applied to most deals given issuer concerns over the information-parity obligations of a joint briefing.

The FCA has now removed this waiting period entirely: connected research may now be published simultaneously with the approved prospectus or registration document. The FCA considers that this will shorten the typical UK IPO public phase by seven days and reduce the issuer's exposure to market volatility during a critical period of the transaction.

Deletion of the Unconnected Analyst Regime. COBS 11A.1.4BR through 11A.1.4ER – which required firms to identify, assess and select an appropriate range of unconnected analysts, form and record a written opinion on that selection, offer those analysts access to issuer communications or identical information, and retain records for five years – have been deleted in their entirety. The related record-keeping entries in COBS Sch 1.3G are also removed.

The FCA concluded that the regime had not achieved its intended effect of encouraging unconnected research and had instead added market risk and costs for issuers, noting that only a small number of unconnected analyst reports had been published since 2018.

Firms and issuers may still choose to engage with unconnected analysts during the IPO process, but this will no longer be mandated, and any conditions would be subject to negotiation.

II. Practical Implications

The reforms deliver a materially shorter public phase – removing up to seven days of market exposure between publication of the registration document and connected research – and eliminate the need to structure joint analyst briefings or manage information-parity concerns. Compliance costs, process management and timetable uncertainty are expected to be reduced.

The reforms also mean that the market practice (which evolved in response to the updated regime in 2018) of publishing an "expected intention to float" or (EITF) announcement together with an approved registration document, one week prior to the publication of research and the "intention to float" (or ITF) announcement, will likely fall away.

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