

PDMR fined £123,500 for undisclosed share dealings

28 November 2024 [Lucy Reeve](#) Capital Markets - Equity - Corporate Governance - Employment and Incentives

The Financial Conduct Authority has fined a former Wizz Air executive £123,500 for breaching the Market Abuse Regulation by both trading during a closed period and failing to notify the FCA and Wizz Air of personal dealings in the company's shares.

This is the first FCA fine for breaching the ban on PDMRs dealing in a closed period (Article 19(11)) and the second fine for breaching the notification requirements (Article 19(1)).

Facts

- András Sebők became Wizz Air's Chief Supply Chain Officer and hence a PDMR in April 2019. His new service agreement included the usual requirements to adhere to PDMR obligations including restrictions on dealing, and notifications.
- Over an 18 month period he carried out 115 trades in Wizz Air shares, involving 121,960 shares worth £4,147,136.66.
- He did not get clearance to deal (which was required under the company's internal share dealing code), and failed to notify the FCA or Wizz Air of these trades. As a result, the company also failed to issue the RNS announcement required under Article 19(3) MAR.
- Of the 115 dealings mentioned above, 18 took place during the 30 day closed periods ahead of Wizz Air's interim and year-end financial reports.

Decision

- This was a clear breach of MAR.
- Mr Sebők (and other PDMRs) received regular reminders of their MAR obligations and in fact did seek clearance to deal on one particular occasion, indicating that he was aware of the requirement.
- The FCA did not criticise the company itself.

Comment

The FCA fine in this case is a good opportunity for companies to remind their PDMRs of their MAR obligations and the requirements under internal share dealing codes. Companies may also wish to consider if it would be a good idea to conduct refresher training and/or roll out e-learning for PDMRs (such as the Linklaters e-learning course – details [here](#)).

See [here](#) for the FCA final notice.

