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# Dealing Room Conduct and Control Framework Training Course for Treasury Leaders

28 February – 4 March 2027  
Doha





## Dealing Room Conduct and Control Framework Training Course for Treasury Leaders

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### Programme Summary

Dealing room conduct and control framework design is the subject of this five-day training course for treasurers, dealing managers and finance leaders at a managerial level, ending in a conduct and control framework for one treasury. Treasury teams commit large sums on individual judgement, yet written policy, conduct rules and role separation are often set apart. The programme moves from governance and conduct principles, through execution and information handling, to limits and segregation of duties, then to reporting and assurance. Mars Training Centre UK delivers this programme in the dealing room conduct and control framework.

### The Business Case

When conduct rules, limits and duties are not written down and tested, one dealer or approver can create losses that reach the board late. Leaders who define who may deal, with whom and under which checks can detect breaches earlier.

- Limit Breaches: Fall as authority limits and pre-trade checks are written and monitored.
- Conduct Incidents: Reduce as conflicts and confidential information are recorded and handled under agreed rules.
- Control Exceptions: Surface sooner as confirmation and settlement points are separated from dealing.

### Principles and Evidence Base

- FX Global Code: Its 55 principles across ethics, governance, execution, information sharing, risk management and compliance, and confirmation and settlement structure Sessions 1 to 3.
- Segregation of duties: The separation of dealing, confirmation, settlement and accounting shapes the duty matrix of Session 3.
- Written treasury policy and authority limits: Regular exposure reporting to the board or an audit committee guides Session 4.

### Intended Participants

- Group treasurers who own treasury policy and dealing authority.
- Dealing room managers who set conduct rules and supervise execution.
- Treasury risk and compliance officers who monitor limits and breaches.
- Finance directors who answer to the board for treasury governance.

The programme serves corporate treasuries, banks, public sector funds and investment firms.



## Learning Outcomes

1. Participants will be able to evaluate a treasury's governance and conduct arrangements against the six areas of the FX Global Code.
2. Participants will be able to construct a conduct charter and conflict of interest register for a dealing room.
3. Participants will be able to diagnose weaknesses in order handling and the protection of confidential information.
4. Participants will be able to design authority limits, counterparty approvals and a segregation of duties matrix.
5. Participants will be able to prioritise monitoring and reporting so that exposures and breaches reach the board.
6. Participants will be able to justify a conduct and control framework to a finance director or audit committee.

## Programme Structure

### Day 1: Treasury Governance and Conduct Principles

What standards of governance and conduct does a treasury owe its organisation and its counterparties?

- FX Global Code Six Areas Map
- Treasury Mandate and Policy Statement
- Ethics and Conduct Charter
- Conflict of Interest Register
- Treasury Governance Gap Inventory

### Day 2: Execution and Information Handling

How are dealing decisions made, and how is information protected?

- Execution Principles Review
- Order Handling Rules Sheet
- Confidential Information Protocol
- Pre-Trade Authority Check
- Dealing Communication Record Review

### Day 3: Limits, Counterparties and Segregation of Duties

Which limits and role separations keep dealing safe?

- Authority Limit Schedule
- Counterparty Approval File
- Front, Middle and Back Office Duty Matrix
- Confirmation and Settlement Control Points
- Exception and Breach Escalation Log



## Day 4: Risk Reporting, Compliance and Assurance

How do the board and audit committee see treasury risk and compliance?

- Treasury Exposure Report Layout
- Compliance Monitoring Plan
- Regulatory Change Register
- Internal Audit Access Protocol
- Board and Audit Committee Treasury Pack

## Day 5: Applying the Dealing Room Conduct and Control Framework to One Treasury

Is the framework ready for a finance director to adopt?

- Applying the Session 1 Gap Inventory to the Chosen Treasury
- Testing the Session 2 Execution Rules Against Live Practice
- Matching the Session 3 Limits to Duty Separation
- Checking the Session 4 Reporting Pack for Completeness
- Completing the Dealing Room Conduct and Control Framework

## Methodology

The programme is built around case analysis. Participants work in small teams on anonymised treasury incidents from corporate and banking settings, and test each control as an auditor would, asking who could bypass it.

- Suggested activity: Reviewing a dealing incident and marking where a limit or duty split failed.
- Suggested activity: Redrafting an authority limit schedule so each approval has an owner and a deputy.
- Suggested activity: Rebuilding a board treasury pack around exposures, breaches and open actions.

## Capstone Output

Each participant completes a conduct and control framework for one treasury. It holds a conduct charter, a limit schedule, a duty matrix, a monitoring plan and a reporting pack. It is used to brief the finance director and guide the next audit committee review.

## Frequently Asked Questions

### Is the dealing room conduct and control framework suitable for finance leaders outside the dealing room?

Yes. The dealing room conduct and control framework is set at managerial level and assumes you read treasury reports, not that you have dealt in markets.



## **Which standard does the dealing room conduct and control framework rest on in this training?**

The dealing room conduct and control framework rests on the FX Global Code, with segregation of duties and written policy and limits as supporting practice.

## **How is the framework from dealing room conduct and control used at work?**

You use the framework to brief the finance director, reset limits and duties, and set the reporting that the board or audit committee receives.

## **How does the dealing room conduct and control framework differ from a programme on cash and liquidity management?**

The dealing room conduct and control framework centres on rules, limits and oversight of dealing, while a cash and liquidity programme centres on forecasting and funding positions.