



ASIC
Australian Securities &
Investments Commission

**Australian Securities
and Investments Commission**

Level 7, 120 Collins Street,
MELBOURNE VIC 3001

Level 5, 100 Market Street
SYDNEY NSW 2001

Postal Address:
GPO Box 9827,
MELBOURNE VIC 3001

Switch: +61 1300 935 075
www.asic.gov.au

12 August 2025

The Hon Dr Jim Chalmers MP
Treasurer

Senator the Hon Katy Gallagher
Minister for Finance

**JOSEPH LONGO
CHAIR**

ADDITIONAL STEPS ASIC WILL TAKE TO BOLSTER ECONOMIC GROWTH

Dear Treasurer and Minister

On behalf of ASIC, I welcomed the opportunity to attend the Investor Roundtable on 6 August 2025. Following this Roundtable the Australian Securities and Investments Commission would like to supplement our letter to you dated 1 August 2025 to include five additional measures to reduce compliance burdens on industry, enhance productivity and ensure our regulatory settings support long-term growth. Attachment A provides a summary of the anticipated productivity-bolstering impacts of these five new actions.

Bolstering productivity and reducing compliance burdens: five key actions

Targeted consideration of disclosure burdens that impact efficient superannuation investment decisions

At the Investor Roundtable, participants raised the view that the obligation to disclose stamp duty may distort superannuation trustee investment decisions relating to property. We will take immediate action on this, by setting up a working group to advise on whether stamp duty should be excluded as a disclosable transaction cost in Regulatory Guide 97 *Disclosing fees and costs in PDSs and periodic statements*.

The group will also, separately, consider potential class order relief regarding how internally managed private credit arrangements are disclosed in private portfolio holdings disclosures. This will be focused on addressing a concern that

there may not be equality of portfolio holdings disclosure obligations across similar asset classes in relation to whether they are internally or externally managed. And, that this may be driving trustee behaviour to hold assets through external asset managers, leading to higher costs to members.

Commissioner Simone Constant will convene the working group, and we will invite diverse representatives from across industry, Government and regulators to participate, including representatives of the investor roundtable attendees.

Reducing data requests and reporting requirements

ASIC understands that the collection of data and other reporting obligations can impose a significant regulatory burden on Australian businesses. We have two concrete actions to raise in relation to data and reporting to reduce burden on industry, and we raise for Government consideration a third proposal.

Firstly, as part of the Council of Financial Regulators' Review into Small and Medium-sized Banks, ASIC has committed to halving the volume of internal dispute resolution reports that small banks need to lodge with ASIC each year – from two to one per entity. To ensure smaller banks see the benefit of this change quickly, ASIC will take a no-action position, as the technical and systems changes required to formalise this change will not be completed until approximately 2027. Around 70 small banks will benefit from this change.

Secondly, for thematic surveillance activities ASIC is committing to reducing data collection through information requests. We will take steps to determine the best way to do this while continuing to ensure our thematic surveillances appropriately identify, understand and assess emerging issues and potential regulatory problem areas.

Finally, for Government consideration, ASIC would support consideration of the Corporations Act Chapter 2M thresholds for when a company is defined as a large proprietary company. Falling within this definition triggers the need to lodge audited financial reports with ASIC and these entities will also be required to lodge climate reports. We estimate that 1535 companies would no longer need to report if the thresholds were adjusted to \$100m revenue and \$50m assets (from \$50m revenue and \$25m assets). If progressed, this change does not require legislation, but would require Government action in the form of a change to the Corporations Regulations.

Streamlining the Financial Accountability Regime

The Financial Accountability Regime created a strengthened responsibility and accountability framework for approximately 250 entities in the banking, insurance and superannuation industries. In addition to imposing accountability obligations, it requires these entities to submit documents to

ASIC and APRA that provide information about entities' accountability arrangements.

Stakeholders have raised that the reporting requirements associated with this regime – which include keeping detailed accountability maps up to date - are burdensome. ASIC and APRA will be starting new work in September aimed at streamlining the operation of the Financial Accountability Regime and considering how it can be better embedded to promote risk management. As part of this work, the regulators will consider whether changes should be made to APRA and ASIC's regulations, which set out information for entities to include in Financial Accountability Regime reporting forms. This will form part of our broader work to improve regulatory transparency and coordination through the ongoing Regulatory Initiatives Grid process.

Encouraging confidence in private markets

Well-managed growth in private markets will help facilitate economic growth and help Australia keep pace in global capital markets. ASIC's focus includes transparency, standardisation, access, and safety, especially for retail investors in private markets.

Improved standardisation and transparency will encourage broader access to and participation in private credit markets, in particular, for the benefit of borrowers and investors. ASIC will continue working with industry on better practices and standards and will include work on identified barriers to a deeper domestic corporate bond market through the next phase of our public and private markets work.

Supporting public and listings markets

ASIC is committed to facilitating competition in clearing and settlement and listing. ASIC is taking the following three actions to support public and listings markets.

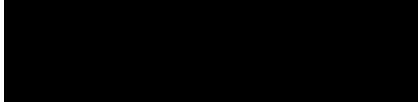
Firstly, ASIC is in the final stages of considering Cboe Australia's listing market application. If approved, this development will enhance competition and attract foreign investment, providing more choice for investors and greater international alignment. If this is approved, it will increase the number of listing markets in Australia by 33% (from three to four).

ASIC is also expanding the approved foreign markets by 15% to include Cboe's US and Canadian exchanges, along with the Canadian Securities Exchange, prospective acquirer of the National Stock Exchange of Australia. This will allow Australian investors to participate in certain transactions in these markets, further integrating Australia into the global financial system.

Finally, ASIC is exploring measures to streamline dual listings of foreign companies in Australia and other innovative applications to attract

international businesses to Australia's public markets. This is in addition to our work to bolster confidence in our current markets infrastructure and to streamline resilience rules for participants. We want Australia to be regarded as an attractive destination for international capital.

Yours sincerely



JOSEPH LONGO

CHAIR

Attachment A: ASIC's five key actions to bolster productivity and reduce compliance burdens

Action	Timing	Number of entities benefitting	Impact			
			Lower costs	Less regulatory requirements	Improved competition	Makes compliance easier
RSE licensees and Responsible Entities Reviewing stamp duty disclosure RSE licencees Reviewing portfolio holding disclosures	Working group to be convened in August, with outputs to be finalised in October	All 54 RSE licensees and 403 Responsible Entities All 54 RSE licensees		✓*		✓*
All ASIC regulated entities Reducing surveillance data requests Reducing small banks internal dispute resolution reporting Financial reporting settings for companies	To be actioned throughout FY25/26 Announced intention on 7 August	All entities subject to ASIC proactive surveillances. We issued 5,556 information notices in FY24/25 Around 70 small banks 1535 companies				
			✓*	✓*	✓*	✓*
			✓	✓		✓

Banks, insurers and RSE licensees Financial Accountability Regime settings	Work to commence in September 2025	Around 250 entities across banking, insurance and superannuation	✓*	✓*	✓*	
Private credit markets Raising standards	Publication of better practices in Q2 FY25/26	All private credit market participants	✓		✓	✓
Listings markets and foreign markets Expanding listings markets Expanding approved foreign markets	Final stages of consideration – Cboe Currently underway	This will increase the number of listing markets in Australia by 33% (from three to four). This will expand approved foreign markets by 15%.	✓		✓	

* Potential impact, pending outcome of consultations