



6 August 2025

[REDACTED]
[REDACTED]

Australian Securities and Investments Commission
Level 7, 120 Collins Street, Melbourne, 3000

By email: rri.consultation@asic.gov.au

ASIC consultations on proposals to facilitate digital disclosure and PDS guidance update

Dear [REDACTED],

Cboe Australia Pty Ltd (**Cboe**) welcomes the opportunity to contribute to the Australian Securities and Investments Commission (**ASIC**) consultation on its proposal to:

- remake *ASIC Corporations (Facilitating Electronic Delivery of Financial Services Disclosure) Instrument 2015/647* (ASIC Instrument 2015/647), and *ASIC Corporations (Removing Barriers to Electronic Disclosure) Instrument 2015/649* (ASIC Instrument 2015/649) (together, the **ASIC Instruments**); and
- update Regulatory Guide 221 *Facilitating digital financial services disclosures* (RG 221) and Regulatory Guide 168: *Disclosure: Product Disclosure Statements (and other disclosure obligations)* (together, the **ASIC Regulatory Guidance**).

Cboe operates a licensed financial market that executes approximately 20% of the total average daily trading volume in the Australian equities market. Cboe's focus as a market operator is to provide trusted, liquid, and resilient markets in support of a larger ecosystem that serves and benefits all investors. Cboe has a well-established market for the admission of Exchange Traded Products and is targeting a Q3 2025 launch for its corporate listings business, so has a strong interest in regulatory settings which ensure disclosures are as efficient and as cost-effective as possible for product issuers.



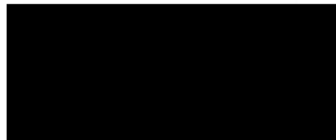
Cboe is also supportive of initiatives that increase the competitiveness of the Australian market and commends ASIC for continuing to support relief that enables digital disclosure practices and thereby increases the accessibility of this information for investors.

Cboe notes that ASIC Instrument 2015/647 specifies the application of the amended definition of 'ETF' for interests in a scheme or shares in a fund which are in a class able to be traded on either of the Cboe or ASX markets. Further, both exchanges are specified in the updated RG 221 in relation to periodic disclosures, ensuring issuers can access the relief for periodic statements that are disclosed via Cboe's market announcements platform as well as ASX's. Cboe supports both of these inclusions.

It is essential that ASIC relief instruments maintain a level playing field for both ASX and Cboe to ensure that the Australian financial system can enjoy the benefits of competition in exchange markets and we encourage ASIC to continue to include this as a key consideration as it reviews and updates relevant relief instruments and regulatory guides. More generally, Cboe supports ASIC's goal in updating its Regulatory Guidance to reduce regulatory complexity, provide practical guidance, enhance clarity, and improve accessibility for all stakeholders.

If you have any questions about this submission please do not hesitate to contact me using the details below.

Yours faithfully,



Cboe Australia Pty Ltd

Ph. [REDACTED]

E. [REDACTED]