

## CHAPTER 03

# ANNUAL PERFORMANCE STATEMENTS

## IN THIS CHAPTER

- > Statement of preparation
- > Performance statements overview
- > What we set out to do in 2024–25
- > Work guided by our strategic priorities
- > Simpler and better regulation
- > Outcomes across our key activities
- > Strategic work across our regulated sectors
- > Operational capabilities
- > Principles of regulator best practice

# Statement of preparation

I, Joseph Longo, as the Accountable Authority of ASIC, present the 2024–25 annual performance statements of ASIC, as required under paragraph 39(1)(a) of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act). In my opinion, the annual performance statements are based on properly maintained records, accurately reflect the performance of ASIC, and comply with subsection 39(2) of the PGPA Act.



Joseph Longo  
Chair, ASIC

## Performance statements overview

In the 2024–25 Corporate Plan, we committed to measuring our performance using a range of indicators and metrics, including qualitative, quantitative and outcome-based. These include case studies, spotlights, narrative, key activity metrics and operational data, to demonstrate performance against our commitments and the outcomes achieved.

To provide a complete view of 2024–25, this chapter sets out ASIC's performance with reference to the 2024–25 Portfolio Budget Statements and Corporate Plan. In addition, for the first time, this chapter includes ASIC's performance on simpler and better regulation, given the establishment during 2024–25 of the ASIC Simplification Consultative Group.

The chapter is structured as follows (see Figure 4):

- ◆ Progress against strategic priorities and focus areas – [Page 26](#)
- ◆ Our work towards simpler and better regulation – [Page 66](#)
- ◆ Progress against key activities, including unclaimed money – [Page 69](#)
- ◆ Progress against work in our regulated sectors – [Page 97](#)
- ◆ Progress against our operational capabilities – [Page 109](#)
- ◆ Alignment to principles of regulator best practice – [Page 114](#).

## ASIC's performance maturity and uplift

We are maturing our approach to the way we plan, measure and assess our performance. We are committed to moving towards better practice in how we demonstrate to Parliament, the public and stakeholders that we are delivering on our purposes. We will continue to mature and refine approaches to performance measurement and reporting over the coming years.

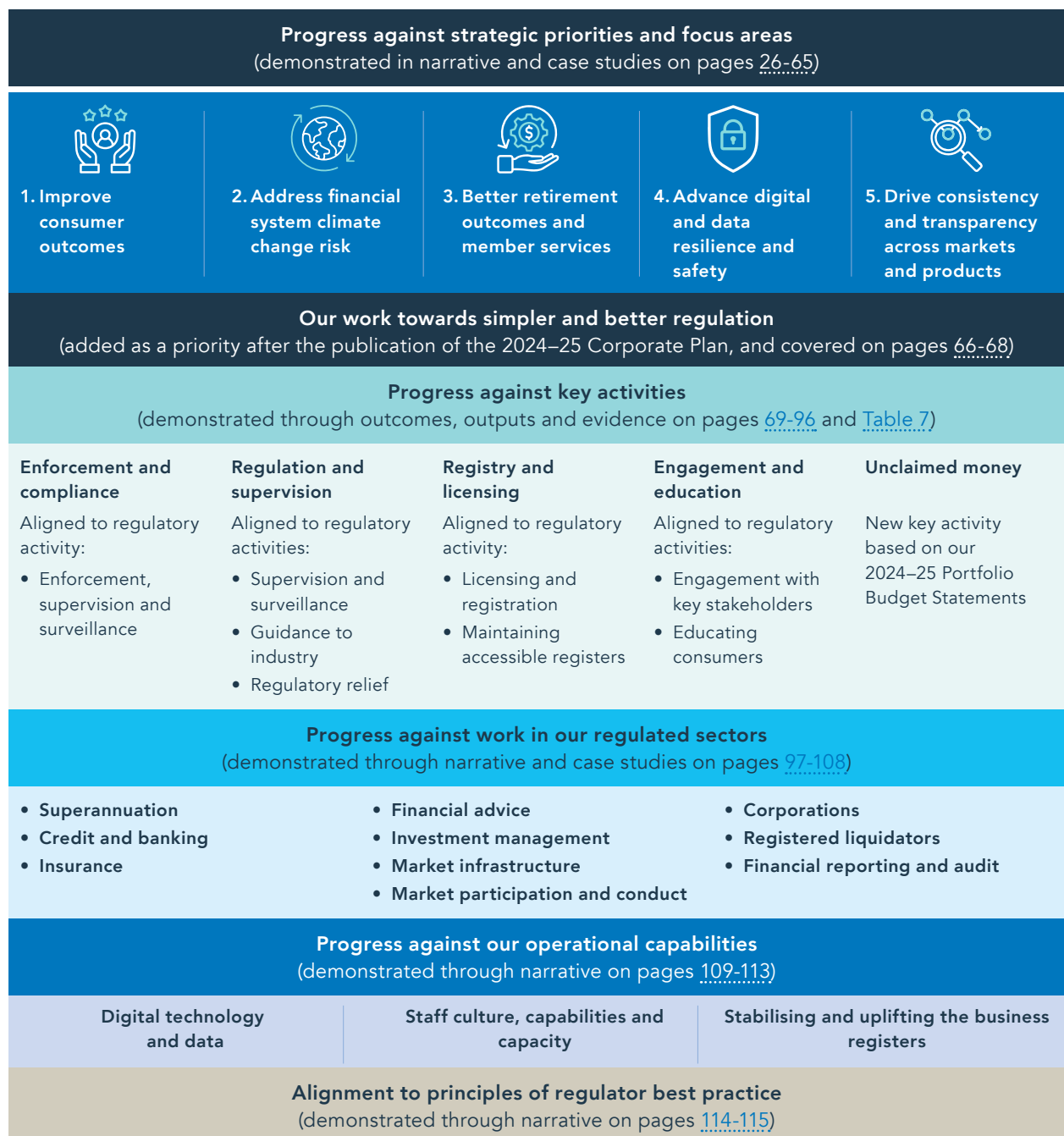
As part of our commitment to better practice, we have introduced a suite of performance measures in our 2025–26 Corporate Plan aligned to our revised key activities. We will first be able to report against these performance measures in the 2025–26 ASIC Annual Report.

Given 2024–25 was a transitional year for ASIC, we have adopted some improvements to our 2024–25 reporting. This includes introducing a revised set of key activities that better reflect the significant areas of work undertaken by ASIC to achieve our purposes and deliver on the requirements outlined in the 2024–25 Portfolio Budget Statements.



# What we set out to do in 2024–25

Figure 4—Performance statements structure



# Work guided by our strategic priorities

Our 2024–25 Corporate Plan outlined our strategic priorities and the focus areas that underpin our key activities. These strategic priorities are based on monitoring and analysis of our operating environment, identification of threats and behaviours that lead to harm, and prioritisation of harms that need to be addressed.

In 2024–25, we identified the five strategic priorities shown below and in [Figure 4](#). These priorities target the most significant threats and harms in our regulatory environment and guide the actions we plan to take over the following four years:

1. Improve consumer outcomes
2. Address financial system climate change risk
3. Better retirement outcomes and member services
4. Advance digital and data resilience and safety
5. Drive consistency and transparency across markets and products.

This section provides narrative and case studies that demonstrate our progress and achievements across each of these priorities.



## Strategic Priority 1 Improving consumer outcomes

This year, our work focused on driving better outcomes for consumers of financial products and services, with a focus on:

- ◆ the design and distribution of financial products
- ◆ predatory sales and lending
- ◆ financial hardship assistance
- ◆ insurance
- ◆ dispute resolution.

### Design and distribution of financial products

In 2024–25, we continued our work to help ensure entities are complying with their design and distribution obligations (DDO). Our focus has been on targeting potential harm to retail consumers from poor product design and distribution practices.

Enforcement action targeting poor distribution of financial products was a 2024 enforcement priority. This resulted in two significant penalty outcomes, which helped clarify the obligations on issuers and distributors of financial products:

- ◆ In our case against American Express Australia (Amex), the Federal Court ordered Amex to pay \$8 million in penalties for DDO breaches relating to two cobranded credit cards that were primarily distributed to customers in David Jones stores.

- ◆ We were successful against non-bank lender Firstmac Limited (Firstmac) in our first DDO case against a distributor. The court found that Firstmac failed to take reasonable steps to ensure that the distribution of its High Livez Product Disclosure Statement to term deposit holders was consistent with its target market determination (see [Case study 1](#)).

We also achieved an important finding in our first action against a crypto and digital asset margin lender. In our case against Bit Trade Pty Ltd, a provider of the Kraken crypto exchange to Australian customers, the court confirmed that lending traditional money to invest in crypto falls within margin lending law and, therefore, the DDO rules apply. Accordingly, the entity is required to prepare a target market determination. See [Existing and emerging financial products and services](#) for more information.

**CASE STUDY 1:****Successful DDO civil penalty action against Firstmac**

On 10 July 2024, the Federal Court found that Firstmac breached the DDO provisions by failing to take reasonable steps that would have resulted in, or would have been reasonably likely to have resulted in, the distribution of one of its investment products being consistent with its target market determination for the product. This was the first finding by a court of a contravention of these provisions.

The court found Firstmac implemented a 'cross-selling strategy' of marketing investments in its High Livez investment product to 780 consumers who held existing term deposits with Firstmac. In doing so, it breached its obligations under the DDO rules when it sent product disclosure statements for the Firstmac High Livez product to those existing term deposit holders without first taking reasonable steps to ensure consistency

with its target market determination for the product. The conduct occurred from October 2021 to September 2022.

The court found the steps that Firstmac took were wholly inadequate to meet the statutory obligations imposed by the DDO legislation.

On 28 January 2025, the court ordered Firstmac pay \$8 million in penalties for failing to meet its obligations under the DDO rules. When handing down her penalty decision, Justice Downes found that Firstmac 'courted the risk' that the High Livez PDS would be distributed to a person who fell outside the target market for High Livez and that its conduct was 'objectively reckless'. She added also that 'Firstmac's conduct fell short of the standard required by the DDO rules and increased the risk of harm to consumers to whom the High Livez PDS was inappropriately distributed'.

**Predatory sales and lending**

This year, we continued to monitor and take action on sales and lending practices that exploit financially vulnerable consumers. Our work in this area included reviews into:

- ◆ compliance with consumer lease requirements
- ◆ compliance with small amount credit contract requirements
- ◆ the compliance practices of debt management firms, which will continue into 2025–26.

Enforcement outcomes in these areas included ASIC's enforcement action against Walker Stores

Pty Ltd trading as Snaffle (Snaffle) and our case against SunshineLoans Pty Ltd (Sunshine Loans) (see [Case studies 2](#) and [3](#)).

We also issued a stop order to Indy-C-Fashion Accessories Pty Ltd (Indy-C), the second time we have done so to prevent a business from offering vulnerable consumers a credit arrangement where we consider that arrangement to be noncompliant with the DDO rules (see [Case study 4](#)).

We will continue to use our full range of powers, including stop orders, to disrupt entities in these circumstances. Business models designed to avoid consumer credit protections is a 2025 enforcement priority for ASIC.



**CASE STUDY 2:****Consumer leases**

On 22 May 2025, ASIC published its [findings from a review of consumer leases](#), following reforms introduced in late 2022.

Consumer leases are contracts that allow a consumer to rent an item for a set period, with ownership remaining with the provider, not the consumer, at the end of the lease term. The total cost of a consumer lease, including all payments and fees, can easily exceed the retail price of the item. Consumer leases often impact financially vulnerable and disadvantaged consumers more severely.

ASIC's regulatory approach involved an integration of our supervision and enforcement activity. Our review put the consumer lease industry on notice that we would take action on potential compliance failures resulting in consumer harm, and this was followed by subsequent enforcement action in 2025.

The review found a significant decline in the number and value of consumer leases, with many providers leaving the sector. Despite these changes in the market, almost 25% of consumer leases were in arrears, indicating the financial vulnerability of many Australians who rely on these arrangements.

Consumer lease providers obtain 80% of their repayments via Centrepay deductions. Proposed reforms to the Centrepay regime include removing consumer leases from it. If implemented, this may see more providers leaving the sector.

The review also found that providers are not doing enough to ensure compliance with the protected earnings amount, they are exceeding the cap on costs, and they are not reviewing bank statements adequately or complying with requirements for suitability assessments.

Concerningly, a number of consumer lease providers are now moving to alternative credit products that can involve other risks for consumers. ASIC continues to be concerned about the detrimental impact of some of these products and will continue to monitor conduct across the consumer lease and short-term credit markets.

In line with the review's findings and our priority to target predatory sales and lending where we consider there to be consumer harm, ASIC took action this year against Snaffle.

ASIC alleges Snaffle circumvented the cap on costs by artificially inflating the cost of household goods and electronics, resulting in customers paying hundreds of dollars more in interest payments than they should have. In addition, Snaffle is alleged to have failed to disclose the cash price and true cost of the credit provided under three contracts.

See [Media release 25-084MR](#), 'ASIC sues online consumer goods supplier Snaffle alleging inflated prices and overcharging on credit contracts', 22 May 2025.



In March 2025, ASIC published [Report 805](#) *Falling short: Compliance with the small amount credit contract obligations*. The report summarises ASIC's review of changes in the small amount credit contract sector following reforms to the small amount credit contract provisions under the *Financial Sector Reform Act 2022*. It also considers the impacts on compliance with existing regulatory obligations that apply to Australian credit licensees, such as the responsible lending obligations. Since the reforms came into effect, we observed:

- ◆ a reduction in the number of small amount credit contracts provided
- ◆ an increase in the number of medium amount credit contracts provided

- ◆ an increase in the total number of missed repayments for medium amount credit contracts but a decline in the total number of missed repayments for small amount credit contracts.

Based on our review of changes in the sector, we are concerned that some small and medium amount credit contract providers may be falling short of their obligations by:

- ◆ entering into unsuitable contracts with consumers
- ◆ failing to identify an appropriate target market and distribute their products accordingly.

We will continue to monitor the sector for any signs of business models that may be attempting to avoid the additional consumer protections imposed on small amount credit contracts.

### CASE STUDY 3:

#### Sunshine Loans

ASIC's continuing court action (commenced in June 2022) against Sunshine Loans established that between July 2016 and November 2020, Sunshine Loans entered into over 670,000 small amount credit contracts, which included an amendment or rescheduling fee that is not permitted by the National Credit Code.

The action was brought by ASIC after a targeted review of the small amount credit contract market during the COVID-19 pandemic identified the misconduct. At the time of the misconduct, Sunshine Loans was one of the largest credit providers in the market.

The National Credit Code limits the fees that may be charged under these loans to an establishment fee, monthly fees, a fee or charge payable in the event of a default, and a government fee, charge or duty payable in relation to the contract.

The Federal Court found Sunshine Loans required the payment of these fees by

consumers over 12,000 times and accepted payments on more than 8,000 occasions. Sunshine Loans received nearly \$300,000 from customers, even though the fees were prohibited under the National Credit Code. Sunshine Loans appealed that decision. The Full Federal Court unanimously dismissed the appeal.

In a separate Full Federal Court proceeding, ASIC successfully appealed a decision by the primary judge to recuse himself from the penalty phase of the hearing, on the basis of apprehended bias argued by Sunshine loans. Sunshine Loans sought leave to appeal that decision to the High Court of Australia, which was granted. The hearing before the High Court will take place on 16 October 2025.

See [Media release 25-056MR](#) 'Full Federal Court finds in favour of ASIC in two appeals concerning Sunshine Loans', 24 March 2025.

**CASE STUDY 4:****Taking action to stop Indy-C from targeting vulnerable First Nations consumers**

Indy-C is a business operating in Katherine in the Northern Territory, selling clothing predominantly to First Nations consumers. We became aware that, among other payment methods, Indy-C was offering credit through a Centrepay deferred debt arrangement. Centrepay allows consumers to pay for goods and services by having purchase amounts deducted from their Centrelink payments.

Following an investigation, in November 2024, ASIC made a final stop order preventing Indy-C from offering Centrepay credit arrangements to consumers in its store. ASIC determined that Indy-C offered its credit arrangements without making a target market determination, required to ensure suitable financial products are provided to consumers with regard to their needs and objectives.

When Indy-C did make this determination, ASIC determined that if the credit arrangement was distributed in the way suggested, it would not be reasonable to conclude that a consumer receiving the credit arrangement was in the target market.

This work follows and complements the action ASIC undertook last year against Coral Coast Distributors (Cairns) Pty Ltd trading as Urban Rampage.

**ASIC Deputy Chair Sarah Court said:**

*'Indy-C provided credit arrangements to First Nations consumers to purchase clothing and household goods via deductions from their Centrelink benefit payments in circumstances where ASIC considers it did so without considering whether the credit arrangement would be consistent with the consumer's objectives, financial situation and needs. Following regulatory action from ASIC, Indy-C made multiple draft target market determinations; however, ASIC considers none complied with Indy-C's design and distribution obligations.'*

Indy-C appealed to the Administrative Review Tribunal for a review of ASIC's decision and a stay of the stop order pending review. The review is ongoing.

See [Media release 24-263MR](#) 'ASIC orders stop to Centrepay credit arrangements offered by Northern Territory business', 29 November 2024.

**Financial hardship assistance**

Financial hardship remains a priority for ASIC.

In the previous financial year, we worked to actively monitor that lenders were providing support for consumers experiencing financial

hardship, and that those consumers knew how to seek help. In May of that year, for example, we published [Report 782](#) *Hardship, hard to get help: Findings and actions to support customers in financial hardship*.

Building on that foundation, this financial year we continued to monitor lender hardship practices. This included collecting data on hardship practices and monitoring lender action plans put in place following the feedback we provided to

individual lenders after our initial report. We also undertook three significant court actions (see [Case study 5](#)).

#### CASE STUDY 5:

### Taking strong action on hardship obligations

Monitoring that lenders comply with hardship obligations and provide adequate support to customers experiencing financial hardship – and acting when they do not – was a 2024 enforcement priority for ASIC. We have undertaken three significant court actions in this area to date.

Two of these involve allegations of failures by Westpac Banking Corporation (Westpac) and National Australia Bank Limited (NAB) (and its subsidiary AFSH Nominees Pty Ltd (AFSH)) to respond to hardship notices within the required timeframes under the National Credit Code. Collectively, this impacted more than 550 customers. Many of these customers were in vulnerable circumstances when they applied for their hardship support. This included customers reporting that they were experiencing domestic violence, serious medical conditions, business closures or loss of employment. Both Westpac and NAB admitted these contraventions at hearings before the Court. The Federal Court ordered NAB and AFSH pay a pecuniary penalty of \$15.5 million. Judgement has been reserved in the case against Westpac.

Additionally, on 20 May 2025, ASIC commenced civil penalty proceedings against Resimac Limited (Resimac), alleging contravention of Resimac's obligation as a

credit licensee to act efficiently, honestly and fairly between 1 January 2022 and 15 February 2024. ASIC alleges that Resimac adopted a 'one size fits all' approach to hardship applications. Resimac typically requested extensive standard information from vulnerable customers without considering whether all of it was relevant and reasonably necessary in light of their individual circumstances and information the customers had already provided. ASIC also claims that when vulnerable customers did not provide any of the standard information, Resimac summarily rejected their hardship applications. This is the first time ASIC has acted against a credit licensee for alleged failures in its approach to assessing hardship applications. ASIC is seeking declarations, penalties, adverse publicity orders and costs.

See [Media release 23-242MR](#) 'ASIC sues Westpac for failing to respond to hardship notices', 5 September 2023.

See [Media release 24-254MR](#) 'ASIC sues NAB for failing customers facing financial hardship', 18 November 2024.

See [Media release 25-081MR](#) 'ASIC sues home loan manager Resimac alleging failures to customers facing financial hardship', published 21 May 2025.

## Insurance

The insurance sector comprises life and general insurance, including insurance product providers such as friendly societies, insurance product distributors, risk management product providers, and claims handling and settling services providers.

This year, ASIC's work focused on investigating home insurance claims handling practices, and working with industry to improve practices. We undertook a review that assessed how general insurers had addressed areas for improvement that were originally identified in August 2023 in [Report 768](#) *Navigating the storm: ASIC's review of home insurance claims*.

Our latest review found that while insurers have implemented programs to improve claims handling functions in recent years, and some progress has been made, there is still significant room for further improvement. The oversight of independent experts by home insurers, for example, needs significant work. Many consumers are also being left in the dark when it comes to information around cash settlements. As part of the review, ASIC also noted continued issues around resourcing, customer communications, identification data, claims handling improvement programs, and audits.

ASIC expects that insurers will assess their claims handling programs against the better and poorer practices we identified and take steps to make meaningful improvements. Insurance claims handling remains an enforcement priority for ASIC in 2025, and evidence of significant misconduct may result in enforcement action.

On 11 April 2025, ASIC commenced proceedings against Hollard Insurance Partners Limited (Hollard Insurance), alleging it breached its duty of utmost good faith in its handling of a home building and contents insurance claim, demonstrating ASIC's willingness to take enforcement action against serious claims handling misconduct (see [Case study 6](#)).

We reviewed past premium increases for life insurance products and related disclosure and marketing materials, looking at whether life insurance companies were meeting their obligations and consumer expectations. In June 2025, we issued a joint update with the Australian Prudential Regulation Authority (APRA) on life insurance practices, noting improvements in re-rating practices, and marketing and disclosure materials. See [News article](#) 'ASIC and APRA provide update on review of life insurance premium practices'. We will continue to monitor actions to address increasing premium volatility through product design.

ASIC also undertook surveillance action to check that general insurers have fair and efficient internal dispute resolution processes in place, in compliance with their regulatory obligations under [Regulatory Guide 271](#) *Internal Dispute Resolution* (see [Case study 9](#)).

**CASE STUDY 6:****Hollard Insurance**

On 10 April 2025, ASIC commenced proceedings against Hollard Insurance for a breach of section 13 of the *Insurance Contracts Act 1984* (Insurance Contracts Act) because it took nearly 3.5 years to resolve a storm damage insurance claim.

ASIC alleges Hollard Insurance breached its duty of utmost good faith in its handling of a home building and contents insurance claim made by a couple from regional Victoria.

The insurance claim was made on 31 October 2021, two days after a major storm damaged the roof of their home, but the couple were made to wait 18 months for their claim to be rejected. Hollard initially accepted the claim, then repeatedly delayed decisions about repairs, then took over nine months to initiate an inspection by a structural engineer and delayed providing temporary accommodation to the couple.

Hollard rejected the claim in late April 2023, relying on a non-expert opinion over prior expert reports on the cause of the damage. The couple rejected a modest cash settlement offer by Hollard and lodged a complaint with the Australian Financial Complaints Authority.

ASIC alleges that the combination of delays in decision making, poor communication and ignoring expert advice exposed the couple to unnecessary and prolonged harm, and breached Hollard's duty of good faith in handling the claim, as implied by the Insurance Contracts Act.

ASIC is seeking declarations and a civil penalty in relation to section 13 of the Insurance Contracts Act.

See [Media release 25-057MR](#) 'ASIC sues Hollard Insurance alleging serious claim handling failures', 11 April 2025.

## Dispute resolution

In December 2024, ASIC published its first internal dispute resolution (IDR) insights report with industry-wide data reported under the IDR data reporting framework (see [Report 801 Insights from internal dispute resolution data reporting: July 2023 to June 2024](#)). This inaugural report was a key milestone in the implementation of the framework. Publishing IDR data promotes transparency in financial services complaints handling by sharing valuable information with consumers while also helping to drive improvements in IDR practices.

In the report, ASIC identified variations and gaps in the self-reported IDR data that indicated there may be inconsistent practices across the financial services industry. ASIC called on financial services firms to carefully review the report and our guidance to assist in reporting IDR data as accurately as possible ahead of firm-level IDR data publication in 2025.

Concurrently, we undertook a review of the IDR practices of general insurers (see [Case study 9](#)).

In April 2025, ASIC consulted on our plan to publish a dashboard with firm-level IDR data in the second half of 2025. By providing consumers and investors access to the IDR data at the firm level, the dashboard will further encourage confident and informed participation in the financial system. ASIC encouraged stakeholders to engage with the consultation to help us assess the impact of our data publication proposals and any alternative approaches.

Looking forward, we will action the reform proposed by the Council of Financial Regulators (CFR) to reduce the IDR data reporting requirement for small banks from 6 months to 12 months. ASIC will take a no-action position for small banks until the technical and system changes are formalised in approximately 2027.

This will effectively bring forward ASIC's implementation of the CFR commitment by more than 12 months, which means there will be an immediate reduction in reporting burden for small banks from the next IDR data submission window in January–February 2026.





## Strategic Priority 2

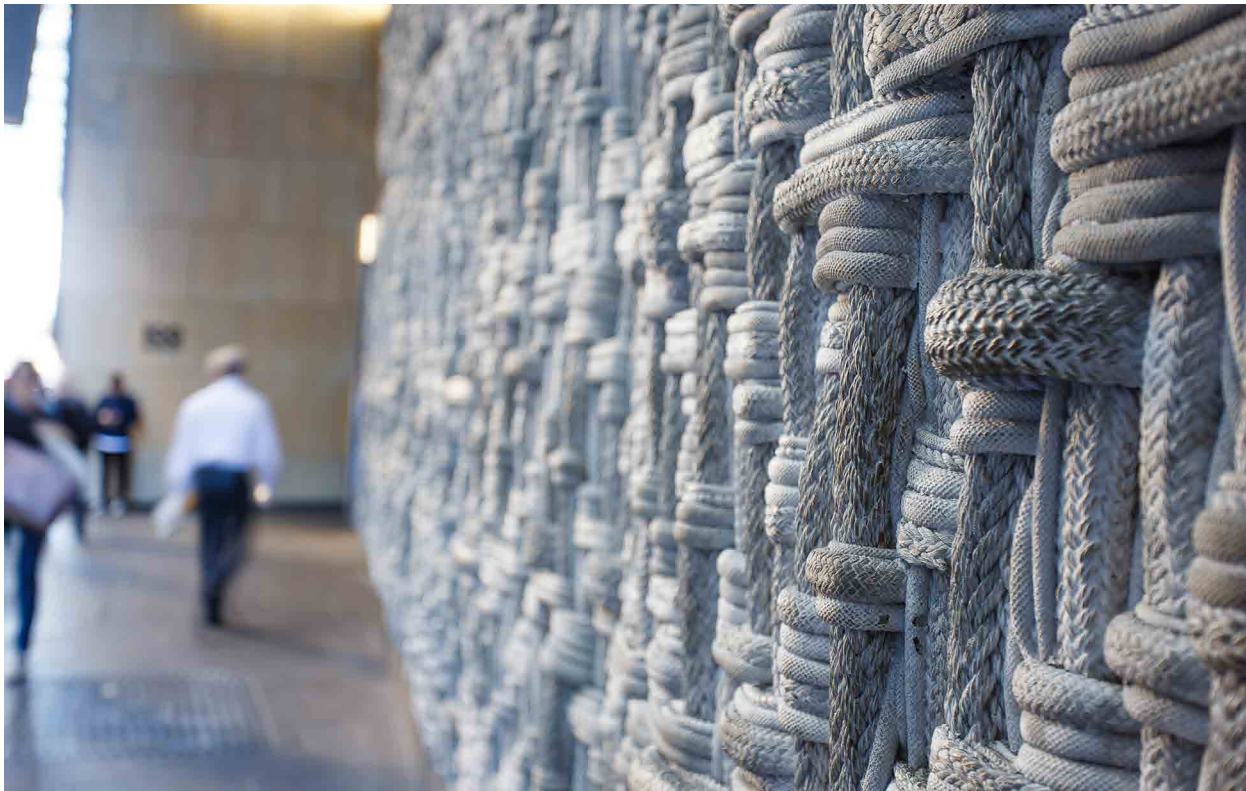
### Addressing financial system climate change risk

This year our work focused on supporting market integrity and protecting consumers and investors, with a focus on:

- ◆ climate-related disclosure
- ◆ greenwashing
- ◆ integrity and fairness in energy and carbon credit markets
- ◆ insurer claims and complaints handling following severe weather events.

#### Climate-related disclosure

ASIC has supported the introduction of mandatory climate-related financial disclosures, with the legislation enacted in September 2024. This year, we have worked to support the implementation of the related reporting requirements through guidance and education. We continue to engage with key stakeholders domestically through the CFR Climate Working Group and internationally through the International Organization of Securities Commissions (IOSCO).





**CASE STUDY 7:****Sustainability reporting**

In March 2025, we published [Regulatory guide 280 Sustainability reporting](#), following an extensive public consultation that started in November 2024.

The regulatory guide provides guidance for entities required to prepare a sustainability report containing climate-related financial information under Chapter 2M of the Corporations Act. This may include companies, registered schemes, registrable superannuation entities and retail corporate collective investment vehicles.

It also includes guidance on the content required in the sustainability report, disclosing sustainability-related financial information outside the sustainability report – such as in disclosure documents and product disclosure statements – and ASIC's administration of the sustainability reporting requirements, including our specific approach to considering relief and use of our new directions power.

Our key objective is to provide broad guidance for entities that need to prepare sustainability reports that include climate-related financial information. Within this, our aim is to assist entities to prepare high-quality climate-related financial disclosures that are useful for making

decisions and comply with the Corporations Act and Australian Accounting Standards Board requirements (AASB S2 *Climate-related Disclosures*).

ASIC recognises that there will be a period of transition as reporting entities continue to build their capacity. As such, we will take a proportionate and pragmatic approach to supervision and enforcement as the requirements are phased in.

We have also been engaging with small business to provide guidance on how the climate-related financial disclosure requirements may impact them. In some circumstances, for example, a small business might be part of a larger entity's work – perhaps as a supplier – and be asked to provide information to the larger entity. We continue to engage on topics such as these.

To assist reporting entities overall, we also established a webpage to provide information about how ASIC will administer sustainability reporting requirements (see [Sustainability reporting](#) on the ASIC website). This has been maintained as an ongoing resource for further information and regulatory guidance.

## Greenwashing

Promoting sound sustainable finance practices continues to be a strategic priority for ASIC. Our continued work this year focused on preventing harms by ensuring that sustainable finance-related products, services and practices comply with existing laws.

Through our ongoing surveillance activities, ASIC intervened to prevent harm to investors and consumers where we identified entities making sustainability-related representations that lacked accuracy, were not based on reasonable grounds, or failed to provide sufficient details to be easily understood by investors. These interventions included obtaining corrective disclosures and pursuing civil penalty proceedings for noncompliance with existing laws.

Our enforcement action targeting greenwashing conduct resulted in three significant civil penalty outcomes this year, totalling over \$30 million in civil penalties and sending a strong deterrent message to the market.

- ◆ In August 2024, the Federal Court handed down its decision in ASIC's first greenwashing civil penalty case and ordered that Mercer Superannuation (Australia) Limited pay a \$11.3 million penalty for making misleading statements on its website.
- ◆ In September 2024, the Federal Court ordered Vanguard Investments Australia Ltd (Vanguard) to pay a \$12.9 million penalty for making misleading claims about environmental, social and governance (ESG) exclusionary screens.
- ◆ In March 2025, the Federal Court imposed a penalty of \$10.5 million against LGSS Pty Ltd, as trustee of superannuation fund Active Super, for greenwashing misconduct. This followed a finding by the Federal Court in June 2024 that Active Super contravened the law when it invested in various securities that it had claimed were eliminated or restricted by its ESG investment screens.

These outcomes also reinforce the messages in our previously released [Information sheet 271](#) *How to avoid greenwashing when offering or promoting sustainability-related products*.

Additionally, there were 14 instances where corrective disclosures in relation to corporate finance transactions were achieved, five significant superannuation fund policy and communication disclosures, and a specific corrective disclosure announcement from a listed entity.

**CASE STUDY 8:****Vanguard**

In September 2024, the Federal Court ordered Vanguard to pay a \$12.9 million penalty for making misleading claims about ESG exclusionary screens. These screens were applied to investments in the Vanguard Ethically Conscious Global Aggregate Bond Index Fund.

**Justice O'Bryan said:**

*'By its misleading conduct, Vanguard misrepresented the "ethical" characteristics of the fund. Approximately 74% of the securities in the fund by market value were not researched or screened against applicable ESG criteria. Further, Vanguard benefited from its misleading conduct. The misrepresentations enhanced Vanguard's ability to attract investors to the fund, and enhanced Vanguard's reputation as a provider of investment funds with ESG characteristics, as compared to what would have been the case if Vanguard had accurately disclosed the ESG screening limitations and the fund's exposure to issuers engaged in the excluded industries.'*

See [Media release 24-213MR](#) 'ASIC's Vanguard greenwashing action results in record \$12.9 million penalty', 25 September 2024.

**Integrity and fairness in energy and carbon credit markets**

ASIC is committed to responding to market manipulation in energy and commodities futures markets. This type of conduct is illegal and erodes confidence in our markets. It impacts farmers, food producers and consumers.

In the 2024–25 financial year, ASIC acted against two market players for allegedly manipulating commodities futures markets. These actions followed our action against market participants J.P. Morgan and Macquarie, which resulted in record penalties imposed on them for failing in their role as gatekeepers to prevent suspicious orders being placed.

This year, ASIC also conducted risk-based surveillance of market intermediaries' energy derivatives and carbon product trading and supervisory functions. Our surveillance focused on firms' arrangements to manage conflicts of interest appropriately, prevent mis-selling and ensure clients in different market segments are treated fairly. This work supports ASIC's ongoing efforts to promote fair and efficient markets for energy and carbon products.

See [Spotlight 8](#).

## Insurer claims and complaints handling following severe weather events

This financial year, we have been monitoring the adequacy of IDR arrangements in general insurance. Our report identified a number of key findings relating to IDR practices (see Case study 9).

### CASE STUDY 9:

#### Monitoring the adequacy of internal dispute resolution arrangements in general insurance

In 2024, ASIC undertook a review to assess how general insurers are supporting customers who make a complaint. We reviewed the practices of 11 insurers providing products such as home, contents and motor vehicle insurance to assess their compliance with the requirements outlined in [Regulatory Guide 271 Internal dispute resolution](#).

On 5 December 2024, ASIC published [Report 802 Cause for complaint: Complaints handling in general insurance](#). This review of IDR practices highlighted the following key findings.

- ◆ Insurers failed to identify one in six customer complaints.
- ◆ Insurers identified only 85 systemic issues from over 1.4 million complaints (the Australian Financial Complaints Authority found 11 systemic issues from approximately 16,000 external dispute resolution complaints).
- ◆ Insurers had immature systems for handling complaints and reporting on complaints.
- ◆ Delay notifications were not provided within required timeframes, and content requirements were not met.

Failing to correctly identify and action complaints prolongs customer distress, which can be particularly difficult at times when those customers are dealing with extreme events, such as floods. Failures to adequately identify systemic issues is concerning because correctly identifying them is critical to preventing other customers from experiencing the same issues.

Missed complaints are a missed opportunity to make things right for individual customers and identify systemic or emerging issues. When a complaint is made during a claim, it is an opportunity to reset the course to help ensure a customer's claim is treated fairly, transparently and in a way that supports the customer, particularly when they are experiencing vulnerability or financial hardship.

Through our work, ASIC set the expectation that insurers consider the issues raised and uplift their approach to complaints handling so that complaints are identified and handled in a timely, fair and efficient way.

ASIC expects all insurers to act on the findings outlined in this report and take steps to uplift their approach to complaints handling.



## Strategic Priority 3

### Supporting better retirement outcomes and member services

This year our work focused on:

- ◆ superannuation member services
- ◆ misconduct exploiting superannuation.

#### Superannuation member services

ASIC is responsible for regulating conduct within the superannuation industry, including insurance claims handling, death benefit claims, and dispute resolution for trustees of registrable superannuation entities.

In 2023–24, ASIC commenced looking at death benefit claims as part of our multi-year review into superannuation industry compliance with laws involving trustee administration and member services. In 2024–25, we undertook an in-depth review of 10 trustees and their handling of death benefit claims, representing a total of 38% of member benefits in APRA-regulated superannuation funds. We looked at documents, information and data about the reviewed trustees' claims handling practices and progress on improvement plans. We also collected individual claim files – including call recordings – and claim-related complaints. In November 2024, we wrote to the CEOs of all APRA-regulated superannuation trustees, highlighting the need for trustees to assess their death benefit claims handling practices and address deficiencies as a priority.

On 31 March 2025, we published our landmark [Report 806](#) *Taking ownership of death benefits: How trustees can deliver outcomes Australians deserve*. Key observations in our report include:

- ◆ significant claims handling delays, with the fastest trustee closing approximately 48% of death benefit claims in 90 days while the slowest trustee only closed 8% of claims in 90 days
- ◆ gaps in trustee oversight and governance, noting that none of the reviewed trustees monitored or reported on end-to-end claim handling times
- ◆ lack of clear claims processes and procedures
- ◆ ineffective and insensitive communication and engagement with grieving claimants
- ◆ inadequate support for First Nations claimants and claimants experiencing vulnerability.

This work has driven practice improvements in the handling of death benefit claims by the reviewed trustees. We have also observed that trustees outside the review are considering and implementing improvements to their death benefit handling practices.

We also launched enforcement action against Cbus and AustralianSuper for failures relating to death benefit claims.

See [Spotlight 1](#).

ASIC will continue to monitor the progress trustees are making on improving their death benefit claims handling processes.

We also achieved a significant penalty in our case against AustralianSuper regarding failure to merge multiple member accounts. On 21 February 2025, the Federal Court imposed a fine of \$27 million, finding AustralianSuper failed to have adequate policies and procedures in place to identify and merge multiple accounts for almost nine years, and continued to charge multiple sets of fees and insurance premiums. This was the first case that ASIC has brought in its capacity as a co-regulator with APRA, alleging contraventions of section 52 of the *Superannuation Industry (Supervision) Act 1993*.

We continued to monitor superannuation trustees' implementation of the retirement income covenant. ASIC has been undertaking a thematic review of trustees' retirement communications, including decision-making processes and guidance tools. Additionally, ASIC and APRA are conducting a second industry Pulse Check, which is focused on monitoring trustees' progress in implementing their retirement income strategies under the covenant.



## SPOTLIGHT 1

# Taking action on death benefit claims failures by superannuation trustees

**ASIC alleges two major superannuation fund trustees failed their members at their most vulnerable time.**

ASIC's surveillance and enforcement work this year had a strong focus on the experience of beneficiaries trying to claim death benefits from superannuation funds. In response to ASIC's actions, several funds have improved their internal processes to support better customer outcomes.

## Surveillance identified significant shortcomings

Following a concerning uptick in reports of service failures relating to death benefit claims and a steep increase in death benefit complaints to the Australian Financial Complaints Authority between 2021 and 2023, ASIC conducted a review of death benefit claims as the first phase of its multi-year member services project.

On 31 March 2025, we published [Report 806](#). *Taking ownership of death benefits: How trustees can deliver outcomes Australians deserve*. None of the surveyed trustees reported monitoring or reporting on their end-to-end claims handling times or performance. Significant variation in

claims handling times were reported, with some trustees in the review closing only about 8% of claims within a three-month timeframe.

*'It is vital that death benefit claims are processed in a timely manner. Delays are likely to cause further pain and anxiety to people already suffering from grief, making what is already a difficult time even harder.'*

**Sarah Court, ASIC Deputy Chair**

## ASIC alleges Cbus members waited 12 months or more

In November 2024, ASIC launched action against United Super Pty Ltd, the trustee of Construction and Building Unions Superannuation Fund (Cbus), alleging that more than 10,000 members' death benefits and total and permanent disability insurance claims took more than 90 days to process.



ASIC alleges that from September 2022 to November 2024, Cbus failed to act efficiently, honestly and fairly in the handling of these claims. By late 2022, for example, more than 6,000 Cbus members and claimants — more than 50% of Cbus's total claims at that time — had their payments delayed by more than 12 months. The financial loss has been estimated by Cbus to be \$20 million to members and claimants.

ASIC also alleges that despite being aware of the seriousness of the matter and having access to reports from its third-party administrator, United Super failed to properly assess the scale of the impact to members and claimants. Further, ASIC alleges that Cbus failed to report the issue to ASIC as a reportable situation under the mandatory reporting regime in a timely manner, as well as having failed to take reasonable steps to ensure eventual reporting was not materially misleading.

### **AustralianSuper took 4 months to 4 years to process claims**

On 11 March 2025, ASIC took enforcement action against AustralianSuper, the trustee of Australia's largest superannuation fund, over delayed processing of death benefit claims.

ASIC alleges that between 1 July 2019 and 18 October 2024, AustralianSuper took between four months and four years, from the date each claim form was returned, to pay or decline at least 6,699 death benefit claims where no objection to the claim was received. In 254 cases, AustralianSuper took between 15 and 213 days to provide the claim form. In one case, despite having all the information required to pay the benefit, it took AustralianSuper 1,140 days to make the payment; for others it took 438 days, 412 days and 366 days.

See [Media release 24-251MR](#) 'ASIC sues Cbus alleging systemic claims handling failures', 12 November 2024.

See [Media release 25-034MR](#) 'ASIC sues AustralianSuper alleging significant death benefit claims failures', 12 March 2025.

## Misconduct exploiting superannuation

ASIC is increasingly observing a range of concerning conduct that puts people's superannuation funds at risk. As superannuation has grown, we are seeing an increasing number of people considering options such as self-managed superannuation funds (SMSFs) or potentially risking their retirement savings by investing in complex schemes or high-risk products.

As a protective measure, in June 2025 we launched a consumer warning campaign calling on Australians to be on red alert for high-pressure sales tactics, clickbait advertising and promises of unrealistic returns, which encourage customers to switch superannuation into risky investments. ASIC has also reminded the financial advice sector of its concerns about business models that use high-pressure sales tactics. In a keynote address in June, Commissioner Alan Kirkland reiterated our expectations to advice licensees that they have a role in preventing misconduct in terms of ensuring their representatives are well supervised and acting in the best interests of clients.

Our recent investigations have identified suspected misconduct, including the involvement of lead generators and financial advisers advising consumers to shift superannuation savings into complex, high-risk schemes.

We have also focused on taking targeted enforcement action against cookie-cutter advice to roll funds into SMSFs and superannuation switching models that result in the inappropriate erosion of superannuation (see [Case study 10](#)).

Our enforcement work focusing on concerns about superannuation savings has included:

- ◆ applying to the Federal Court for asset preservation orders and appointment of receivers, including in the ongoing matters of Shield, First Guardian (see [Spotlight 2](#)) and Australian Fiduciaries.
- ◆ obtaining interim orders from the Federal Court freezing the assets of financial advice licensee United Global Capital Pty Ltd and related property investment company Global Capital Property Fund Limited (GCPF) followed by orders winding up GCPF.
- ◆ commencing civil proceedings against company director David McWilliams and several of his companies that offered investment opportunities for purpose-built, NDIS-compatible property development schemes across Australia, including ALAMMC Developments Pty Ltd, SDAMF Pty Ltd, Harvey Madison Capital Pty Ltd and Coral Coast Mutual Pty Ltd.
- ◆ intervening in proceedings resulting in orders appointing receivers to wind up the Private Access Fund and the Real Estate Equity Fund operated by ISG Financial Services Limited (in liquidation).

**CASE STUDY 10:****Inappropriate cookie-cutter advice, conflicted remuneration and an \$11 million penalty**

In April 2025, following proceedings brought by ASIC, the Federal Court imposed a penalty of \$11.03 million on DOD Bookkeeping Pty Ltd (in liquidation), previously Equiti Financial Services Pty Ltd (Equiti FS) for breaching conflicted remuneration rules and for inappropriate 'cookie-cutter' advice given by its advisers.

ASIC's case concerned \$130,250 in bonuses paid to three financial advisers who provided template advice to clients to roll over their superannuation into self-managed super funds and use those funds to buy property through a related entity, Equiti Property Pty Ltd.

The Court found that the bonuses paid to the three advisers, which were paid when the clients settled on property offered through Equiti Property, influenced the advice they provided and also breached conflicted remuneration laws. The Court found that in

the case of 12 sample client files, the advice failed to consider each client's individual circumstances or objectives.

ASIC took this action to deter misconduct relating to financial product advice and the deliberate exploitation of superannuation savings. The Court found that there was little or no heed paid to the particular circumstances of the individual clients, they were not given sufficient time to understand the advice given to them, and the advice was focused on manoeuvring them into property purchases through self-managed super funds.

ASIC cancelled Equiti FS's Australian financial services licence on 7 November 2024.

See [Media release 25-063MR](#) 'Financial services provider penalised \$11 million over "cookie-cutter" advice and conflicted bonus payments', 24 April 2025.

## SPOTLIGHT 2

# Targeting exploitation of superannuation savings

ASIC is taking action against schemes that target superannuation savings. We launched a warning campaign educating consumers through our Moneysmart website about taking unwise risks with their retirement savings.

Recent ASIC investigations have uncovered suspected misconduct that could financially affect thousands of Australians and their superannuation savings. We are concerned about a range of conduct, including lead generators and financial advisers advising thousands of consumers to move their superannuation savings into complex and high-risk investment schemes.

In June 2024, ASIC took court action against Keystone Asset Management Limited due to concerns relating to the possible mishandling of significant superannuation monies invested in the Shield Master Fund (Shield).

*'When it comes to sales calls about super switching, there are some big red flags people should be alert to – being asked to make a quick decision is one of the most obvious. Remember, a good deal won't vanish overnight'*

Sarah Court, ASIC Deputy Chair

In February 2025, ASIC also took court action against Falcon Capital Limited due to concerns about the operation and management of the First Guardian Master Fund (First Guardian).

ASIC's investigation to date suggests that many investors were called by lead generators and referred to financial advisers who advised them to switch their superannuation assets into a retail superannuation fund available on a choice platform, and then invest into Shield or First Guardian.

Across the two funds, over 11,000 consumers have invested approximately \$1.1 billion through superannuation platforms, with liquidator reports indicating significant funds have been dissipated. Both funds are now in the process of being wound up.

We have taken a range of enforcement actions in relation to these matters. We have issued stop orders to prevent ongoing consumer harm, commenced court proceedings to freeze assets, restricted the travel of persons of interest, and appointed receivers and liquidators with the aim of preserving assets. We executed numerous search warrants with the assistance of the Australian Federal Police. We have cancelled licences, banned individuals and wound up several entities.

The investigation is complex, involving many players. ASIC investigators are examining evidence regarding possible misconduct by the responsible entities, their directors and officers; the role of the APRA-regulated superannuation trustees; the Australian financial services licence holders; certain financial advisers who recommended investors invest in Shield; the lead generators; and others.

In 2025, ASIC undertook a multiphase public information and warning campaign to raise awareness around the risks of shifting superannuation funds into other superannuation funds connected to high-risk investments. The campaign alerted people to high-pressure sales tactics that may be used to encourage them to invest, and to fully consider the implications of suddenly switching superannuation.

The campaign featured targeted social media and traditional advertising directing consumers to the Moneysmart website for further advice, as well as targeted media interviews. We estimate that this campaign reached a potential audience of over 3 million Australians.

See [Protect your super from pushy sales calls – Moneysmart.gov.au](#).

See [Media release 24-197MR](#) 'Court appoints receivers and new voluntary administrators to Keystone', 6 September 2024.

See [Media release 25-027MR](#) 'Federal Court freezes assets of First Guardian Master Fund and director David Anderson', 28 February 2025.

See [Media release 25-055MR](#) 'Court orders Falcon Capital and the First Guardian Master Fund to be wound up', 10 April 2025.



## Strategic Priority 4

### Advancing digital and data resilience and safety

This year, our work focused on managing and minimising technology-, cyber- and data-related risks, with a focus on:

- ◆ technology-enabled scams and misconduct, and the poor use of artificial intelligence (AI)
- ◆ business, cyber and operational resilience.

#### Technology-enabled scams and misconduct, and the poor use of artificial intelligence

Scams continue to cause significant financial and non-financial harm to consumers, including the most vulnerable people in our community. The Australian Competition and Consumer Commission's (ACCC) Targeting scams report for 2024 reported scam losses of \$2 billion. Despite a 25.9% decrease from 2023, there are still countless human stories of the devastating impact of scams on Australians. This impact extends beyond financial loss – itself potentially life-changing – to devastating emotional harm.

Combating scams is a strategic priority for ASIC.

Our work in this area is principally focused on reducing the impact of investment scams on Australians, and how the firms we regulate are protecting their customers from scams and responding to customers who have been scammed.

#### Combating scams

We work closely with the National Anti-Scam Centre as the lead agency coordinating scam disruption efforts across industry and government in Australia.

Between 1 July 2024 and 30 June 2025, ASIC coordinated the removal of more than 6,900 investment scam and phishing websites and online advertisements. This includes approximately:

- ◆ 2,800 fake investment platforms scams
- ◆ 1,400 phishing scam hyperlinks
- ◆ 2,400 cryptocurrency investment scams
- ◆ 250 online investment scam advertisements.

It also includes websites impersonating Australian businesses and financial services licensees. ASIC is well placed to efficiently assess these impersonated websites as we bring sector-specific knowledge and data holdings to our assessment, reducing the risk of legitimate websites being taken down (see [Case study 11](#)).

The quick removal of malicious websites is an important disruptive step to stop criminal scammers from causing further harm to Australians.

This year, ASIC added 1,035 listings to our Investor Alert List. We also published consumer warnings about investment scams and scams in the financial services sector, and, through our consumer website Moneysmart, information on investment scams.

We also took proceedings for the first time against a licensee, alleging it failed to protect its customers from scams (see [Case study 12](#)).

#### CASE STUDY 11:

### Website impersonating Australian financial services licensee

ASIC received a report submitted to Scamwatch by an Australian consumer, involving a suspected investment scam website falsely impersonating PBA Corporation Pty Ltd, an Australian financial services licensee. A second impostor website was identified during ASIC's enquiries.

The websites were sophisticated. They purported to offer consumers access to financial products including bonds, mutual funds and exchange-traded funds. The scammers were seeking to entice Australian consumers to hand over their funds with promises their services were designed to 'identify lucrative investment opportunities'.

The scammers went so far as to include a complaints page and a warning to consumers about how to protect themselves from scams. The warning stated they were aware of scams impersonating PBA Corporation Pty Ltd, which was their very conduct. All of this was done to make the websites seem as legitimate as possible.

ASIC's checks identified a number of inconsistencies on the two impostor websites, including the physical addresses. ASIC contacted the licensee, who confirmed they had no association with the websites.

ASIC referred the websites for takedown. ASIC also added an alert about the websites on Moneysmart's investor alert list.



**CASE STUDY 12:****Taking action against scams – filing proceedings against HSBC Bank Australia Limited**

In December 2024, ASIC filed proceedings against HSBC Bank Australia Limited (HSBC Australia) in the Federal Court. This is the first time ASIC has filed court proceedings alleging that a licensee failed to adequately protect its customers from scams. This work demonstrates ASIC's focus on advancing digital and data resilience and safety to protect consumers from technology-enabled scams.

ASIC alleges that there was a significant escalation in reports of unauthorised transactions by HSBC Australia customers from mid-2023, which often occurred after scammers had obtained access to customer accounts by impersonating HSBC Australia staff. Between January 2020 and August 2024, HSBC received approximately 950 reports of unauthorised transactions, resulting in customer losses of about \$23 million. Almost \$16 million of this occurred in the six months from October 2023 to March 2024.

ASIC alleges that HSBC Australia failed to have:

- ◆ from January 2020, adequate systems and processes to prevent significant, widespread or systemic noncompliance with its obligations to investigate reports of unauthorised transactions within specified

timeframes; and adequate systems and processes to promptly reinstate banking services to customers who reported unauthorised transactions

- ◆ from 1 January 2023 to 1 June 2024, adequate controls for the prevention and detection of unauthorised payments.

ASIC contends that, as a result, HSBC Australia failed to do all things necessary to ensure that:

- ◆ The financial services covered by its Australian financial services licence were provided efficiently, honestly and fairly in contravention of its obligations under section 912A(1)(a) of the Corporations Act.
- ◆ The credit activities authorised by its credit licence were engaged in efficiently, honestly and fairly in contravention of its obligations under section 47(1)(a) of the *National Consumer Credit Protection Act 2009*.

ASIC is seeking declarations of contraventions, pecuniary penalties, adverse publicity orders and costs.

See [Media release 24-280MR](#) 'ASIC sues HSBC Australia alleging failures to adequately protect customers from scams', 16 December 2024.

## Share sale fraud

Following a spike in reports of stolen shares and an industry thematic review, we engaged with market intermediaries, warned investors and issued updated guidance for Australian financial services (AFS) licensees about how they can reduce share sale fraud risks to their clients and business. 'Share sale fraud' refers to the fraudulent activity of a person who is not who they claim to be, selling or transferring shares that do not belong to them.

Our updated [Information sheet 237](#) *Protecting against share sale fraud* includes observations on recent share sale fraud methods by bad actors, and better practices for prevention and detection. AFS licensees that deal in

securities have a critical role in preventing and detecting share sale fraud, both individually and collectively.

In addition to updating our guidance to market intermediaries, we warned investors with a media campaign and case study of a listed company director whose shares had been targeted by fraudsters.

Our work with market intermediaries is the third phase of ASIC's fraud and scams prevention work, following previous reviews of anti-scam practices in the banking and superannuation industries.

### CASE STUDY 13:

#### Share sale fraud consumer warning campaigns

Share sale fraud can have devastating financial and emotional impacts on the lives of people who fall victim.

As well as calling on market intermediaries to step up efforts to protect their customers, ASIC led investor warning campaigns in October 2024 and June 2025, and we updated our Moneysmart website with tips for investors to protect themselves from identity theft. The campaigns raised awareness that share sale fraud can happen to anyone and that vigilance and quick action are crucial to detect and disrupt theft of shares.

ASIC recommended that investors:

- ◆ review share portfolios regularly
- ◆ be on the lookout for suspicious activity with their share registry, share trading and bank accounts

- ◆ use passphrases rather than simple passwords for online accounts, and turn on multifactor authentication – if available
- ◆ lock and check their mailbox frequently to prevent mail theft
- ◆ report suspicious activity to their stockbroker, share registry and the Australian Federal Police using the [ReportCyber portal](#) and the Australian Government's [Scamwatch](#) website
- ◆ contact [IDCARE](#), a free government-funded service, which can help develop a specific response plan if a person's identity has been compromised.

See [Media release 25-107MR](#) 'ASIC warns industry and consumers of share sale fraud', 24 June 2025.

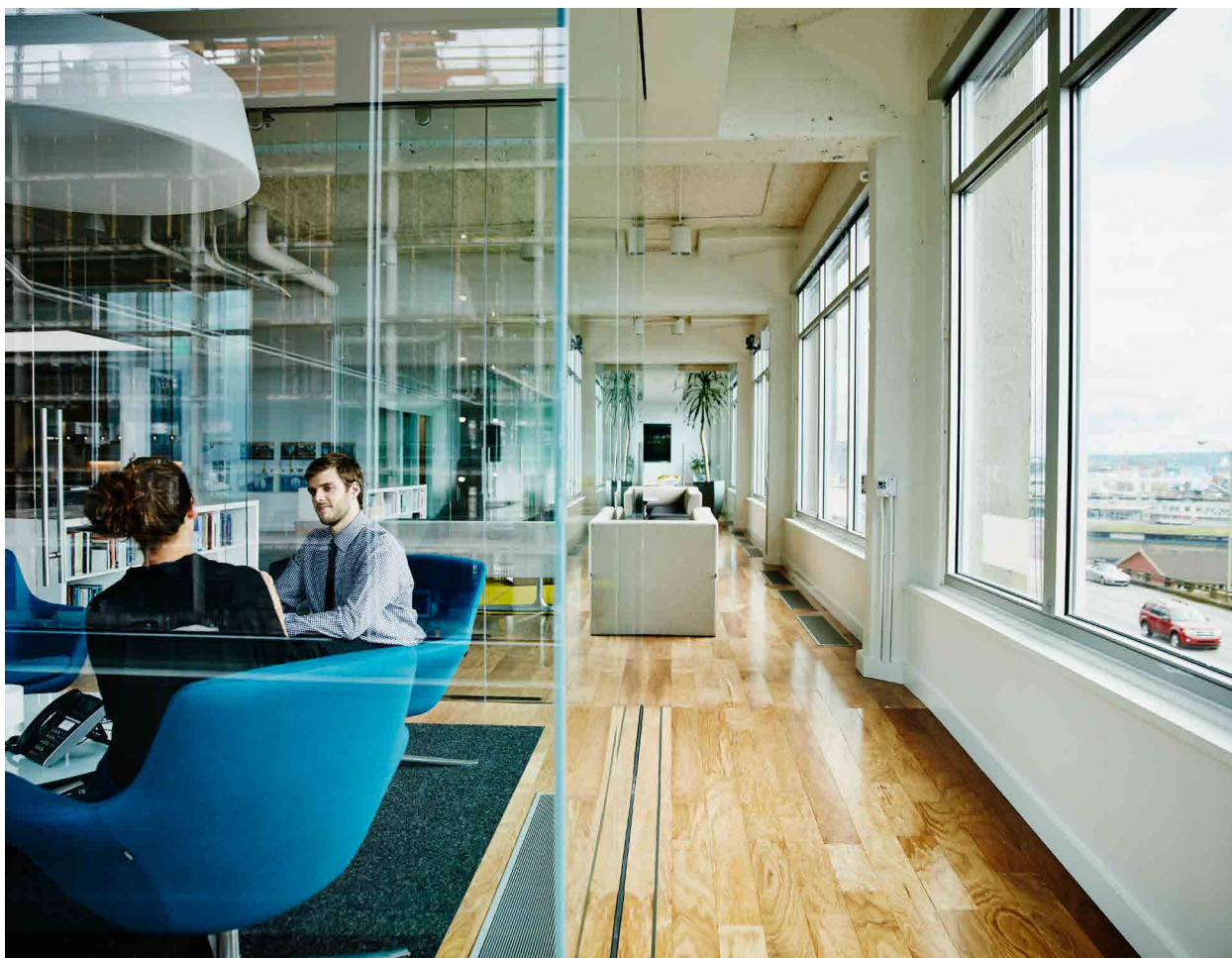
## Monitoring adoption of AI

In our recent review of the current and planned use of AI by 40 market intermediaries, we found that AI adoption is growing, and that many market intermediaries lacked AI-specific, documented governance arrangements. As such, there may be gaps in AI risk assessment.

The review responses revealed 70% of market intermediaries currently use AI, and 71% are expecting to expand their use in the next 12 months. AI is primarily being used by these market intermediaries for information generation, with use cases expected to increase over the coming year.

These review findings mirror the same risks identified in ASIC's October 2024 review of the use and adoption of AI by 23 licensees ([Report 798 Beware the gap: Governance arrangements in the face of AI innovation](#)), which found there was potential for governance to lag behind AI adoption, despite current AI use being relatively cautious (see [Case study 14](#)).

We urge market participants to ensure their governance practices and risk management systems keep pace with their accelerating adoption of AI.



**CASE STUDY 14:****AI innovation and the adequacy of governance arrangements**

On 29 October 2024, ASIC released [Report 798](#) *Beware the gap: Governance arrangements in the face of AI innovation* — our first state-of-the-market review on the use of AI by financial services and credit licensees.

AI has the potential to transform how financial services and credit are delivered in Australia. It offers opportunities for more efficient, accessible and tailored products and services. However, AI can also amplify existing risks to consumers and introduce new ones. Potential harms include bias and discrimination, provision of false information, exploitation of consumer vulnerabilities and behavioural biases, and the erosion of consumer trust.

To better understand emerging risks and inform its regulatory response, ASIC reviewed the AI practices of 23 licensees across the banking, credit, insurance and financial advice sectors. The review focused on 624 AI use cases — both in use and in development as of December 2023 — that directly or indirectly impacted consumers. These included generative AI and advanced data analytics models. ASIC also examined each licensee's governance and risk management arrangements and met with 12 licensees in June 2024 to discuss their approaches in more detail.

This point-in-time review found that while most licensees were cautious in their use of consumer-facing AI, competitive pressures and business needs may drive faster adoption of more complex and opaque types of AI, such as generative AI — potentially outpacing the development of their governance frameworks that allow them to identify, mitigate and monitor the new risks and challenges these models bring. This creates a risk of governance gaps that may widen over time.

In some cases, licensees were updating their governance arrangements in parallel with expanding AI use. For two licensees, however, governance lagged behind deployment. Given that governance and risk management systems are typically slow to evolve, this misalignment could leave some licensees unprepared to respond safely to rapid innovation.

The report called on licensees to review their arrangements in line with the findings of Report 798 and emphasised that licensees' governance arrangements should lead their AI use as it increases and evolves, to ensure that innovation is balanced with the responsible, safe and ethical use of AI. In the report, ASIC also reminded licensees that the regulatory framework for financial services and credit is technology-neutral, and that licensees need to consider their existing regulatory obligations before deploying AI.

## Business, cyber and operational resilience

In 2024–25, we continued to focus on robust cyber risk management and operational resilience among the entities we regulate, supporting a whole-of-government response and working closely with other agencies, regulated entities and the government to address these critical issues.

We also contributed to government policy initiatives, including Horizon 2 of the 2023–2030 Australian Cyber Security Strategy Action Plan, and provided input to proposals by the Council of Financial Regulators (CFR). We continued to actively participate in joint initiatives and incident responses with the CFR Cyber and Operational Resilience Working Group.

We support the advancement of cyber resilience in our regulated entities through engagement on systemic risks, strategic communications and taking enforcement action where appropriate to drive behavioural change in our regulated entities.

This year, ASIC completed a feasibility assessment of a self-deployed exercise for our regulated entities to improve cyber resilience. Further, we continue to actively support the CFR Cyber and Operational Resilience Intelligence-led Exercises to improve cyber resilience within the Australian financial services industry.

We continue to work on whole-of-government information-sharing initiatives, including the first version of a single reporting portal. This portal, located at [cyber.gov.au](https://cyber.gov.au), is designed to clarify the reporting obligations for Australian entities that may be triggered by a significant cyber incident.

ASIC's role as a conduct regulator makes us particularly concerned about the harms that may arise for Australian investors and financial consumers where their investment manager or financial adviser may rely on offshore providers to hold sensitive information or transact on their behalf. The ability of investment managers and financial advisers to manage these risks is an area ASIC is monitoring. We are considering how these entities manage risk related to technology, data sharing and privacy, including the security of client data when sending it offshore.

In the face of an increasing number of cyber threats, all companies must remember that cyber security is not a 'set and forget' matter. Australian regulated entities must ensure they have adequate cyber security measures in place. Where ASIC considers a firm has not met its cyber risk management obligations, we may consider regulatory and enforcement action to drive changes in behaviour.

See [Spotlight 3](#).

## SPOTLIGHT 3

# Promoting cyber security and resilience

ASIC has taken enforcement action against FIIG Securities for failing to put in place adequate cyber security measures.

With one cyber attack reported every six minutes in Australia, it is imperative licensees have adequate cyber security protections. This is an enforcement priority for ASIC.

ASIC commenced proceedings against FIIG Securities Limited (FIIG) in the Federal Court in March 2025, alleging it failed to adopt adequate cyber security measures for more than four years.

ASIC has alleged that FIIG's cyber security failures enabled a hacker to enter its IT network and go undetected from 19 May 2023 until 8 June 2023, resulting in the theft of personal information and subsequent release of client data on the dark web.

Approximately 385 GB of confidential data was stolen, with some 18,000 clients notified that their personal information may have been compromised.

*'This matter should serve as a wake-up call to all companies on the dangers of neglecting your cyber security systems.'*

**Joseph Longo, ASIC Chair**

The stolen data included highly sensitive client information, including names, addresses, birth dates, and details of driver's licences, passports, bank accounts and tax file numbers.

Australian Financial Services licensees are required to have adequate cyber risk management systems in place.

ASIC is seeking declarations of contraventions, civil penalties and compliance orders.

We are sending a clear message to licensees that appropriate cyber security measures are their responsibility and of critical importance.

See [Media release 25-035MR](#) 'ASIC sues FIIG Securities for systemic and prolonged cyber security failures', 13 March 2025.



## Strategic Priority 5

### Driving consistency and transparency across markets and products



This year our work focused on strengthening integrity across markets, with a focus on:

- ◆ outcomes in public and private markets
- ◆ existing and emerging financial products and services, including new market participants.

#### Outcomes in public and private markets

Australians can be confident in the integrity of our equity markets.

In July 2024, we published our findings that Australia's equity markets continue to operate with a high level of integrity and remain consistently among the cleanest in the world. We launched the report at an event hosted by Bloomberg, where ASIC's Chair and ASIC Commissioner Simone Constant were joined by Guy Fowler of Barrenjoey and Helen Lofthouse of Australian Securities Exchange (ASX).

We then released a discussion paper, in early 2025, on the opportunities and risks emerging from shifts in public and private capital markets:

[Discussion paper 1](#) *Australia's evolving capital markets: A discussion paper on the dynamics between public and private markets*. The paper called for feedback and debate on key questions relating to ASIC's regulatory approach and sought actionable ideas to enhance the operation of Australia's capital markets (see [Spotlight 4](#)).

To enhance our enforcement capabilities further, we also established our insider trading taskforce — a dedicated criminal investigation team to swiftly progress insider trading investigations and increase the number of criminal briefs ASIC refers to the Commonwealth Director of Public Prosecutions. Over the year, this group has

commenced nine insider trading investigations and conducted three search warrant operations across the country, with assistance from the Australian Federal Police.

We continue to have concerns regarding the ASX's governance, capability and risk management. In 2024, we announced ASIC was taking enforcement action against the ASX for alleged misleading statements relating to the Clearing House Electronic Subregister System (CHES) replacement program. Early in 2025, ASIC and the Reserve Bank of Australia announced we were acting on deep concerns about the ASX following the CHES batch settlement failure on 20 December 2024.

In June 2025, ASIC announced it would conduct an inquiry into the ASX, with a focus on the group's governance, capability and risk management frameworks and practices (see [Spotlight 5](#)).

We have not ruled out using our new regulatory powers under reforms to modernise the regulatory framework for financial market infrastructures, and further rulemaking under the Competition in Clearing and Settlement reforms if our concerns are not urgently addressed.

Our strong action against the ASX signals our commitment to maintaining the integrity and efficacy of Australia's equity markets.



## SPOTLIGHT 4

# Ensuring Australia's markets are open, accessible and transparent

With the balance of Australian public and private markets shifting, ASIC is working to understand associated implications and improve practices.

Australia's capital markets are a fundamental part of the economy, playing a crucial role in supporting commercial activity, growth, investment and innovation.

Private markets are growing significantly in Australia and abroad. Meanwhile, the number of initial public offerings (IPOs) is declining, and companies are delisting. The changing dynamic between public and private markets is a global trend.

To better understand these changes, ASIC released [Discussion paper 1](#) *Australia's evolving capital markets: A discussion paper on the dynamics between public and private markets*, seeking insight and actionable ideas from interested parties on how to address the challenges. The paper supports ASIC's role in balancing the dual goals of ensuring Australia's public and private markets are open, accessible and attractive and support economic growth, while protecting against risks to consumers and investors.

*'The growth of private markets has been a fundamental good – but we don't want it to come at the expense of public markets.'*

*Public and private markets should complement, not cannibalise each other.'*

**Simone Constant, ASIC Commissioner'**

## Changing trends and an increase in private market investment

Within the paper, we identified a mix of cyclical and structural drivers contributing to the sustained decline in initial public offerings and decrease in the number of listed companies, including the relative costs and demands of remaining listed. At the same time, private markets have grown significantly, with capital flowing into private equity, private credit and other alternative investment vehicles.

We heard private markets are playing an important role in supporting innovation and growth in Australia's markets. We also heard concerns about transparency, market discipline and investor protection, and the need to ensure high standards of governance and disclosure in these less visible parts of the market.

We have seen an increase in retail investor participation in private markets, whether directly or through managed investment schemes and superannuation funds. This shift has prompted feedback to ASIC for additional supervision of these markets, including when it comes to valuation of assets, management of conflicts of interest and meaningful disclosure of fees and risks, as well as further information from ASIC on what good looks like.

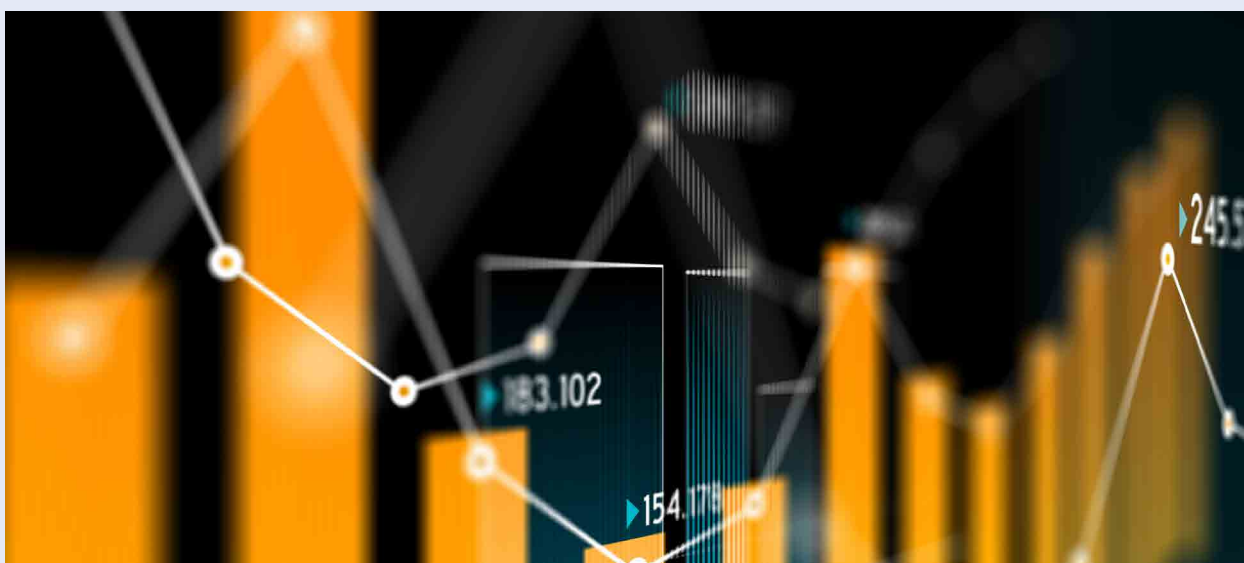
Superannuation funds have emerged as major participants in private markets. Their growing allocations to private assets bring with them an ongoing need to focus on measures to support market integrity, such as information sharing and the management of conflicts and risk. ASIC is closely monitoring this trend and considering whether additional guidance or regulatory measures may be warranted on disclosure and conduct practices of superannuation trustees to promote good member outcomes.

## Regulatory initiatives to facilitate fair and transparent markets

In response to feedback about barriers to IPO listings, ASIC has commenced a two-year trial to facilitate a shorter IPO timetable for entities listing on the ASX via the fast-track process. The process allows certain entities to provide a pathfinder document to ASIC for review up to 14 days ahead of formal lodgement, reducing potential delays post-listing.

Feedback from stakeholders has identified significant gaps in data and market transparency in relation to private market activity. These gaps limit ASIC's ability to effectively monitor risks and help ensure market confidence. Improving the availability and quality of data across private markets will be a key focus in the period ahead.

ASIC is undertaking surveillance of private market retail and wholesale funds, as well as obtaining relevant insights from market experts. This work will examine issues relating to governance, valuation practices, conflicts of interest, distribution and the fair treatment of investors.



### Existing and emerging financial products and services, including new market participants

For some time, the digital asset industry has been calling for greater clarity in how the current law applies to this sector. ASIC commenced a project this year to update our crypto and digital asset guidance ([Information sheet 225](#) Crypto-assets) in response to this, and to drive greater consistency in this part of the financial market.

In December 2024, ASIC released [Consultation paper 381](#) *Updates to INFO 225: Digital Assets: Financial products and services* to seek feedback on our proposed updates to Information sheet 225. To provide greater clarity about the current law, we proposed a range of updates to that information sheet, including adding 13 practical examples of how the current financial product definitions apply to digital assets and related products.

ASIC received more than 60 submissions on our draft updated guidance, and we are currently assessing them and revising the guidance accordingly. We expect to release the updated guidance in the third or fourth quarter of 2025.

ASIC also took compliance and enforcement action this year to clarify how current laws apply to crypto and digital assets.

We took action against Bit Trade Pty Ltd, a provider of the Kraken crypto exchange to Australian customers, which offered a margin lending service for clients investing in crypto and digital assets but did not follow the design and distribution obligations (DDOs) for this, including preparing a target market determination. The case turned on whether lending money to clients to invest in crypto and digital assets was a 'margin loan' under the current law and, therefore, whether DDO consumer protections applied. The court held that lending traditional money (AUD or USD) to invest in crypto did fit within the definition of margin loan — and, as such, that DDO rules applied — but that lending crypto for the same did not.

**CASE STUDY 15:****Clarifying how the law applies to crypto and digital assets**

From March 2022 to November 2022, Block Earner offered consumers a crypto-asset-related product called 'Earner', which allowed consumers to earn fixed-yield returns from different crypto-assets. ASIC was concerned that Earner was a financial product and that Block Earner should therefore have held an Australian financial services licence or appropriate authorisation. ASIC was concerned that consumers were left without important protections.

In February 2024, the Federal Court held that Earner was a financial product. In June 2024, the Federal Court relieved Block Earner from liability to pay a penalty for contraventions related to unlicensed financial services when it offered the Earner product.

ASIC appealed the 'relief from liability' decision, and Block Earner cross-appealed the 'financial product' decision.

In April 2025, the Full Federal Court held that the Earner product was not a financial product (and therefore did not need to make a finding on the relief from liability issue).

In September 2025, ASIC received special leave from the High Court to appeal the Full Federal Court's decision. ASIC's appeal seeks to obtain the High Court's ruling on what falls within the definition of financial product and clarify when interest-earning products and products involving a conversion of assets from one form into another are regulated. This clarification is important, as it applies to all financial products and services, whether they involve crypto-assets or not.

See [Media release 25-194MR](#) 'High Court grants ASIC special leave to appeal Block Earner decision', 5 September 2025.

## SPOTLIGHT 5

# Acting on financial market system failures

ASIC has ramped up scrutiny of the ASX, taking enforcement action and launching an inquiry.

The Australian Stock Exchange (ASX) operates critical infrastructure that is vital to Australia's financial system. This includes trading platforms and clearing and settlement facilities. Any failure in this space can erode trust in Australia's financial system.

As a co-regulator, along with the Reserve Bank of Australia (RBA), ASIC is responsible for ensuring these services are provided in a fair and effective way.

The RBA and ASIC have taken several steps to address their increasing concern over the management of operational risk at ASX.

## ASIC launches inquiry into ASX

In June 2025, ASIC announced an inquiry into ASX, focusing on governance, capability and risk management frameworks and practices across the group.

This followed ASIC and the RBA expressing ongoing concerns over ASX's ability to maintain stable, secure and resilient critical market infrastructure.

The inquiry, led by an expert panel, will make recommendations in a report to ASIC by 31 March 2026. ASIC will publish a report on the outcome of the inquiry, which will inform the next steps it may take.

*'ASIC's decision to initiate an inquiry follows repeated and serious failures at ASX.'*

Joseph Longo, ASIC Chair



### **Alleged misleading statements relating to the CHESSE replacement project**

In August 2024, ASIC commenced proceedings in the Federal Court against ASX Limited, for allegedly making misleading statements relating to its Clearing House Electronic Subregister System (CHESSE) replacement project. This system ensures trades are processed and finalised.

ASX had announced on 10 February 2022 that the project remained 'on-track for go-live' in April 2023 and was 'progressing well'.

ASIC alleges those representations were misleading and deceptive because, at the time of the announcements, the project was not tracking to plan and ASX did not have any reasonable basis to imply the project was on track to meet future milestones.

### **Promoting competitive outcomes in clearing and settlement**

In February 2025, ASIC required the ASX to publish its clearing and settlement fees alongside that of international providers and to provide its clearing and settlement services in a transparent, non-discriminatory way.

It marked the first time ASIC exercised its new powers under the Competition in Clearing and Settlement services reforms.

The new rules support the long-term confident and informed participation of investors in Australian financial markets by establishing clear obligations to promote competitive outcomes in the provision of clearing and settlement services.

See [Media release 25-103MR](#) 'ASIC Launches Inquiry into ASX', 16 June 2025.

See [Media release 25-050MR](#) 'RBA and ASIC act on deep concerns with ASX', 31 March 2025.

See [Media release 25-019MR](#) 'ASIC makes new clearing and settlement rules to promote competition', 25 February 2025.

## SPOTLIGHT 6

# Enforcement action on failures of governance, systems and controls

ASIC has taken several actions against Macquarie Group to address repeated and underlying compliance, governance and supervisory failures.

Multiple enforcement actions taken against Macquarie Group this financial year highlight the importance of robust internal controls, effective risk management and a culture of accountability within financial institutions. They also reinforce the necessity for institutions to proactively identify and rectify issues to maintain trust and confidence in Australia's financial markets.

ASIC has expressed deep concerns with longstanding issues at Macquarie Group, including ineffective supervision and weak compliance.

*'Our intervention underscores our concern with the recurrent nature of Macquarie's failures, which were caused by ineffective supervision and weak compliance and control management.'*

**Simone Constant, ASIC Commissioner**

## Unauthorised fee transactions

In April 2024, Macquarie Bank was ordered to pay a penalty of \$10 million for failing to have effective controls to prevent and detect unauthorised fee transactions conducted by third parties, such as financial advisers, on customer cash management accounts using Macquarie's bulk transacting facility.

ASIC has taken a further three actions in the 2024–25 financial year.

## Gatekeeping failure

Macquarie Bank Limited was fined a record \$4.995 million for failing to prevent suspicious orders being placed on the electricity futures market. This is the highest penalty ever imposed by the Markets Disciplinary Panel (MDP).

ASIC referred the matter to the MDP following an investigation.



On 50 occasions from January to September 2022, Macquarie breached market integrity rules by permitting three of its clients to place suspicious orders. The MDP found Macquarie should have suspected each of the orders were submitted with the intention of creating a false or misleading appearance in the market.

### Licence conditions

ASIC has imposed additional conditions on Macquarie Bank Limited's Australian financial services licence after multiple and significant compliance failures, some going undetected for many years and one for a decade.

The compliance failures related to Macquarie's futures dealing business and its misreporting of over 375,000 over-the-counter (OTC) derivative transactions.

The additional licence conditions will require Macquarie to prepare a remediation plan and appoint an independent expert to review and report on the adequacy of the plan and the effectiveness of the remediation.

ASIC's intervention underscores its concern with the recurrent nature of Macquarie's failures, which were caused by ineffective supervision and weak compliance and control management.

The control weaknesses ranged across poor change management practices, unclear roles and responsibilities, and an incomplete understanding of its own processes and controls, including around data governance.

The additional licence conditions are a significant administrative action aimed at ensuring Macquarie comprehensively addresses ASIC's concerns. It cannot be a piecemeal or bandaid fix.

### Alleged misleading conduct

ASIC is suing Macquarie Securities (Australia) Limited (MSAL), alleging it engaged in misleading conduct by misreporting at least 73 million short sales to the market operator for over 14 years, which may have also led to the financial services industry relying on misleading and false information during that time.

In its first short sale reporting case, ASIC alleges the misleading conduct was due to multiple systems-related issues, many of which remained undetected for over a decade. ASIC also alleges that MSAL failed to have appropriate systems, processes, controls, resources and technological governance to comply with its short sale and regulatory reporting requirements.

See [Media release 24-080MR](#) 'Macquarie Bank to pay \$10 million for failure to properly monitor system for third-party fee withdrawals from customer accounts', 19 April 2024.

See [Media release 24-211MR](#) 'Macquarie Bank fined a record \$4.995m for serious market gatekeeping failure', 25 September 2024.

See [Media release 25-068MR](#) 'ASIC acts against Macquarie Bank for repeated compliance failures', 7 May 2025.

See [Media release 25-074MR](#) 'ASIC sues Macquarie Securities for repeated and systemic misleading conduct', 14 May 2025.

# Simpler and better regulation

This year, ASIC has embarked on a comprehensive program of simplification work, with a focus on how we can make the most difference as quickly and efficiently as possible for consumers, investors, businesses and directors.

See [Spotlight 7](#).



## SPOTLIGHT 7

# Acting on regulatory complexity

ASIC has embarked on a comprehensive, multi-year program of work to simplify regulation.

The increasing complexity of Australia's regulatory framework has been identified as a barrier to effective compliance and enforcement, and navigating it has become a significant challenge for individuals and businesses. Our experience is that simpler regulation enhances compliance and helps us more quickly take action where needed. We consider that simplifying financial services laws will help promote innovation and increase productivity and competition, because companies can focus more on providing services and less on compliance burdens.

With this in mind, ASIC has embarked on a comprehensive program of simplification work, focusing on how we can make the most difference as quickly and efficiently as possible for consumers, investors, businesses and directors.

We began by establishing the ASIC Simplification Consultative Group, comprising expert consumer, business and industry leaders. The group's main role is to provide ideas to address regulatory complexity in areas of law administered by ASIC. Its initial focus has been on what can be done to effect meaningful change quickly and without the need for legislative change, but it is also identifying and promoting impactful and achievable law reform.

*'The ASIC Simplification Consultative Group is charged with bringing fresh thinking and practical ideas to simplify and consolidate ASIC's work, including our regulatory guidance and legislative instruments, and to identify the highest priority, most useful potential law reforms to address complexity in the regulatory framework.'*

Joseph Longo, ASIC Chair

We have also introduced – and are continuing to work on – initiatives aimed at making it easier to engage with our systems and processes. In June 2025, we launched a redesigned webpage on how to report misconduct to ASIC, with a simplified online form and accompanying user guide. For liquidators specifically, we stopped issuing automatic requests for supplementary reports, with requests now strategically targeted only to matters where we are most likely to take action, thus reducing unnecessary time and cost burdens on liquidators.

In May 2025, we launched a new, streamlined, modern and user-friendly digital application process for Australian financial services licences. Integrated into the ASIC Regulatory Portal, the new process simplifies how licensees apply for, vary or cancel a licence, or notify ASIC of changes. This complements work on the regulatory section of our website overall, with a major redesign resulting in a modernised look, feel and navigational experience, where information is much easier to find. We also recently began a two-year trial to support faster initial public offerings for entities listing on the ASX market through the fast-track process.

Our simplification work is ongoing.



# Outcomes across our key activities

The following demonstrates our progress against the outcomes committed to in the 2024–25 Corporate Plan. Key activity metrics and service charter results are available in [Table 7](#) and [Appendix 10](#), with narrative and case studies provided below.

## Enforcement and compliance

Enforcement action is one of the key regulatory tools available to us to help achieve a fair, strong and efficient financial system for all Australians. Our enforcement actions focus on preventing and addressing significant harm to consumers, markets and our financial system.

It is important to note, however, that ASIC is not a complaint resolution body, and our purpose is not to resolve individual consumer disputes and complaints. Instead, we take strategic enforcement action based on harms and patterns of misconduct we identify through the intelligence we receive.

Our cross-agency triage and decision-making process allows us to harness our collective knowledge and expertise to align our regulatory, supervisory and enforcement functions. It also allows us to maximise decision-making efficiency and take faster action on egregious conduct. This process has resulted in matters being consistently referred within two days of being accepted for triage.

## Criminal convictions

In 2024–25, our investigations resulted in 19 people or companies convicted of criminal offences following prosecution by the Commonwealth Director of Public Prosecutions. There were 14 custodial sentences (including fully suspended sentences), and 6 people imprisoned (excluding custodial sentences served by way of an Intensive Correction Order or where the defendant is released on recognisance to be of good behaviour). There were a further 5 non-custodial sentences.

The total value of criminal fines ordered was \$16.8 million.

## Civil actions

In 2024–25, we completed civil actions against 140 defendants, covering issues such as breaches of design and distribution obligations, directors' duties, continuous disclosure obligations and conflicted remuneration rules; unlicensed conduct involving managed investment schemes; and misleading statements about sustainable investment options. We also took action to wind



up companies on just and equitable grounds, following findings that the companies had been incorporated with false information.

The total value of penalties for these civil court cases was \$104.1 million.

### Protective actions

We banned, removed or restricted 58 people or companies from providing financial services, and 33 people or companies from providing credit services.

We disqualified or removed 14 people from directing companies.

We took action against 51 company and SMSF auditors.

We issued instruments, reprimands or warnings to 14 financial advisers through the Financial Services and Credit Panel.

### Corrective actions

We took action where credit licensees, superannuation trustees or responsible entities made misleading statements to consumers or investors. In 14 instances, potentially misleading or deceptive promotional material was withdrawn or amended in 2024–25.

### Infringement notices

In 2024–25, ASIC issued 16 infringement notices.

There were 14 infringement notices issued to entities, and we received \$494,540 in related payments. We issued notices against the following parties:

- ◆ Optix Australasia Pty Ltd (\$187,800)
- ◆ Australian Advice Network Pty Ltd (\$31,300)
- ◆ IA Advice Pty Ltd (\$31,300)
- ◆ Sherrin Partners Services Pty Ltd (\$31,300)
- ◆ Chapter Two Holdings Pty Ltd (\$37,560)
- ◆ Zurich Australia Limited (\$37,560)
- ◆ Australian Retirement Trust Pty Ltd (\$18,780)
- ◆ Equity Trustees Limited (\$56,340)
- ◆ Skye Money Pty Ltd (\$31,300)
- ◆ Smart Financial Capital Pty Ltd (\$31,300).

The Markets Disciplinary Panel issued two infringement notices to two market participants, with a total of \$5.139 million in penalties for alleged breaches of the market integrity rules.

### Court enforceable undertakings

Court enforceable undertakings are a flexible tool that ASIC can use to improve compliance with the law and encourage a culture of compliance.

We accepted three court enforceable undertakings in 2024–25.

We monitor all active court enforceable undertakings to check that all obligations are met. Currently, we are monitoring eight such undertakings, and our work indicates that all parties are complying.

## Compliance activity

As outlined above, ASIC takes strategic enforcement action based on harms and patterns of misconduct we identify through the intelligence we receive. However, enforcement action cannot be taken in every instance. Our choices are strategic, with our compliance work designed to have maximum impact across as many sectors and matters as possible.

ASIC uses a wide range of data and analytics to highlight noncompliance and to take appropriate and proportionate action.

We undertake a range of activities to facilitate compliance with the law and regulations. This can include reactive surveillances from specific reports of alleged misconduct, as well as proactive surveillances based on thematic reviews and trends, themes or issues we have identified.

We assist external administrators, under our External Administrator Assistance Program, to obtain a Report on Company Activities and Property or company books and records in the possession of officers and third parties. ASIC may also contact company officers or third parties to check that they have actioned their statutory obligations to assist liquidators and administrators when companies enter external administration. Where compliance is not achieved, and failure to assist the liquidator or administrators persists, we may commence criminal proceedings against the company officers or third parties. In 2024–25, ASIC received 1,804 requests for assistance from external administrators.

## Enforcement examples

As ASIC is a law enforcement agency, the volume and results of our enforcement activities provide an important measure of our performance. [Table 7](#) contains data on our enforcement activities, and we also use case studies to illustrate the impact of our actions.

In choosing case studies for this annual report, we prioritised those that demonstrate our enforcement mandate and clearly relate to the priorities identified in our Corporate Plan, and those identified in our enforcement priorities for 2025.



## SPOTLIGHT 8

# Responding to commodity market manipulation

ASIC has taken action to address alleged manipulation in the electricity and wheat futures markets, resulting in a record fine against Macquarie and the commencement of court action against Delta Power & Energy and COFCO.

ASIC is committed to responding to market manipulation in energy and commodities futures markets.

In the 2024–25 financial year, ASIC acted against two market players for allegedly manipulating commodities futures markets. These actions followed our action against market participants J.P. Morgan and Macquarie for failing in their role as gatekeepers to prevent suspicious orders being placed.

## Alleged manipulation of wheat futures market

We commenced civil proceedings against COFCO International Australia Pty Ltd and COFCO Resources SA for alleged manipulation in the wheat futures market.

ASIC's civil penalty proceeding against these entities alleges the companies manipulated the ASX 24 market for Eastern Australia Wheat futures January 2023 contracts on 34 occasions, placing orders shortly before the close, for the improper purpose of affecting the daily settlement price.

ASIC is seeking declarations and pecuniary penalties against both COFCO International Australia Pty Ltd and COFCO Resources SA.

The COFCO proceedings followed ASIC's actions in the last financial year against J.P. Morgan Securities Australia Limited for failure to prevent suspicious trades on the wheat futures market.

*'ASIC is committed to responding to market manipulation in electricity and commodities futures markets. This conduct is illegal. It erodes trust and confidence in our markets; increases costs for participants; hurts farmers, food manufacturers, importers and exporters; and impacts the prices Australians pay at the checkout.'*

**Joseph Longo, ASIC Chair**

## Alleged manipulation of electricity futures market

We commenced civil penalty proceedings against Delta Power & Energy (Vales Point) Pty Ltd (Delta) for alleged manipulation in the electricity futures market. ASIC alleges that on 30 occasions between 8 September 2022 and 6 October 2022 Delta placed an order for quarterly electricity futures contracts on the ASX 24 market for the improper purpose of affecting the daily settlement price of those products.

The Delta proceedings followed our enforcement action earlier this financial year against Macquarie Bank Limited for failing to prevent suspect orders being placed on the electricity futures market.

Macquarie Bank Limited was fined a record \$4.995 million for failing to prevent these suspicious orders being placed. This is the highest penalty ever imposed by the Markets Disciplinary Panel.

See [Spotlight 6](#).

See [Media release 24MR](#) 'J.P. Morgan Securities \$775,000 penalty for market gatekeeper failure', 9 May 2024.

See [Media release 24-163MR](#) 'ASIC sues COFCO International Australia Pty Ltd and COFCO Resources SA for futures market manipulation', 25 July 2024.

See [Media release 24-211MR](#) 'Macquarie Bank fined a record \$4.995m for serious market gatekeeping failure', 25 September 2024.

See [Media release 25-115MR](#) 'ASIC sues Delta Power & Energy (Vales Point) Pty Ltd for alleged futures market and financial benchmark manipulation', 30 June 2025.

## SPOTLIGHT 9

# Calling out misleading price discounts

## ASIC took enforcement action against QBE Insurance for allegedly misleading over half a million customers over price discounts.

In October 2024, ASIC commenced court proceedings against QBE Insurance (Australia) Limited (QBE) alleging it misled customers about the value of discounts offered on certain general insurance products.

Between July 2017 and September 2022, QBE made statements and sent renewal notices promising discounts on premiums for a range of general insurance products, including home, contents and car insurance.

However, ASIC alleges QBE used a pricing model that then eroded the discounts received by over half a million customers, in some cases to nil.

*'The failure of insurers to deliver on pricing promises is a key priority for ASIC, and we will continue to take action to hold insurers to account.'*

Sarah Court, ASIC Deputy Chair

The discounts were offered through more than 500,000 renewal notices to retirees, loyalty customers, QBE shareholders, those holding multiple QBE policies, and those holding QBE policies who had made no claims.

Statements offering pricing discounts were also made in various product disclosure statements published on QBE's website.

Proceedings have been filed in the Federal Court. ASIC is seeking civil penalties and adverse publicity orders.

Where insurers make discount promises to renewing customers, they must have robust systems and controls in place to ensure their customers receive the discounts they were promised.

See [Media release 24-234MR](#) 'ASIC alleges QBE misled customers over pricing discounts', 23 October 2024.

## Regulation and supervision

### Supervision and surveillance

ASIC's supervision and surveillance work is core to our statutory mandate to monitor and promote market integrity and consumer protection in the Australian financial system. Through our work, we seek to influence behavioural change and prevent harm resulting from poor corporate systems and conduct. We also seek to ensure that entities and individuals are acting in the best interests of consumers and investors, and that financial services providers have resources, competence and systems in place to operate efficiently, honestly and fairly. We conduct targeted, risk-based surveillance across our regulated populations to maximise the impact and benefit of our work. This includes surveillance of corporate transactions, market activities and financial reporting and audit quality.

Our enhanced supervision focuses on those financial institutions that have the greatest potential impact on consumers due to market

share or other factors. This focused supervision seeks to proactively minimise misconduct and consumer harm by improving organisation-wide factors, including governance, accountability, systems and culture.

For more on how we work to improve customer outcomes, see [Strategic Priority 1](#).

### Guidance to industry

In support of all our strategic priorities, ASIC provides industry with clear and accessible guidance – through regulatory guides, consultation papers and information sheets – on how we administer the law. Our goal is to help industry participants better understand their obligations and how to comply with the law so that they can meet their regulatory requirements.

Our feedback reports offer insight into ASIC's approach and responses to consultations. In 2024–25, we published 20 consultation papers, 49 new or updated regulatory guides, and 87 new or updated information sheets. For a complete list of all publications, please visit our website at [www.asic.gov.au/regulatory-resources](http://www.asic.gov.au/regulatory-resources).

#### CASE STUDY 16:

##### Buy now pay later

In May 2025, ASIC released [Regulatory Guide 281](#) *Low cost credit contracts* to help buy now pay later providers understand and comply with new credit obligations, including the modified responsible lending obligations for low-cost credit contracts.

We publicly consulted on a draft of the guide and received feedback from buy now pay later providers, industry associations and consumer advocates. We released a summary of the

feedback and how we addressed it in the final guide. Alongside Regulatory Guide 281, ASIC released [Information sheet 285](#) *Buy now pay later credit contracts: Credit licensing*, outlining the licensing requirements for buy now pay later providers. Together, these resources aimed to prepare providers for new credit laws commencing 10 June 2025.

## Implementing the Financial Accountability Regime

The Financial Accountability Regime (FAR), which already applies to the banking industry, commenced for the superannuation and insurance industries on 15 March 2025. Following on from the release of a range of guidance materials for the banking sector last financial year, ASIC and APRA finalised the FAR Regulator rules and released updates to the guidance for the broader FAR-regulated population.

APRA and ASIC have worked closely and assisted these industries to prepare for successful FAR implementation by publishing observations on the banking industry's implementation of FAR. We also directly engaged with regulated entities, including via online seminars and Q&A sessions, which were received positively.

### Regulatory relief

Where appropriate, we continued to provide relief to participants in capital markets and the financial services industry, with the aim of facilitating business, promoting innovation and supporting the Australian economy.

During the year, we received 1,106 applications for relief from requirements of the Corporations Act, with 859 granted.

## Registry and licensing

### Licensing and registration

ASIC assesses applications for Australian financial services (AFS) licences, credit licences, audit companies, registered companies and self-managed superannuation fund auditors. We also support the committee that assesses the registration of liquidator applications. Aligned with the principles of regulator best practice, we use a risk-based approach to assessment, devoting more of our resources to complex and high-risk applications to help ensure only suitable persons and organisations are licensed or registered.

In 2024–25, ASIC finalised 1,644 AFS licences and credit licence applications, including cancellations and suspensions.

We approved 678 AFS licences and 173 credit licences. We cancelled or suspended 215 AFS licences and 253 credit licences, the majority of which were licensees voluntarily applying for licence suspension or cancellation.

During the year, 325 AFS licence and credit licence applications were withdrawn, rejected for lodgement or refused. Of these, 184 were withdrawn, mostly after we completed our assessment and informed applicants that they were unlikely to meet the statutory requirements to obtain a new or varied licence.

We refused to accept 138 applications for lodgement, mainly due to material deficiencies in the information provided. No applications were refused in 2024–25.

We assessed 747 applications relating to registered company auditors (RCAs), authorised audit companies and SMSF auditors. Of these, 170 were approved, 35 were withdrawn and 542 were cancelled or suspended.

**CASE STUDY 17:****Australian financial services licence application withdrawn after concerns raised by ASIC**

The licensing team is ASIC's front-line gatekeeper for our regulated populations.

In 2024, an entity applied for an AFS licence to provide certain financial services to wholesale clients. As part of ASIC's assessment, we became aware of concerns about the applicant's proposed responsible manager, which could provide a reason for ASIC to believe that the fit and proper person test in s913BA of the Corporations Act may not be met and that the applicant may be likely to contravene the general AFS licensee obligations in s912A if the licence was granted. To assess these concerns, we issued a notice under s913B of the Corporations Act to the applicant, requiring the provision of further relevant information.

After receiving the applicant's response to this notice, we formed the view that the information provided in the response contained material omissions, was materially misleading, that ASIC had reason to believe that the fit and proper test was not satisfied, and that the applicant was likely to contravene the general licensee obligations in section 912A if the licence was granted.

For these reasons, we communicated to the applicant that we were inclined to refuse the application. In response, the applicant withdrew their application.

***Contributing to the development of a licensing regime for payments providers***

The government is updating the payments regulatory framework so that it is fit for purpose for the modern economy. As part of that update, a licensing framework will be introduced for payment service providers, which will be administered by ASIC.

ASIC actively engaged with Treasury, APRA, the RBA and other regulators on the development of legislation for the new licensing framework. Together with other payment system regulators, ASIC also participated in the Inter-Agency Payments Forum to consider broader policy issues affecting the payment system.

***Contributing to the development of a licensing regime for buy now pay later providers***

From 10 June 2025, buy now pay later contracts were regulated as credit products under the *National Consumer Credit Protection Act 2009*. This means that buy now pay later providers must now hold a credit licence that authorises them to engage in credit activities as a credit provider.

As part of the policy development of these reforms, we worked closely with Treasury to provide input on the implementation of the regime, including the credit licensing requirements and transitional arrangements for buy now pay later providers.

To support industry with implementation of the reforms, we also prepared guidance, including on key obligations and the credit licensing application process. We also updated our licensing forms to accommodate the licensing applications. We engaged with industry associations and members to consult on our guidance and help them understand their obligations.

### ***New portal for Australian financial services licence applications***

This year, we introduced a new digital AFS licence portal that simplifies how licensees submit and vary applications, cancel licences and notify ASIC. The new licensing portal is integrated into the ASIC Regulatory Portal and provides a more streamlined, secure and user-friendly process, making transactions more intuitive and easier to navigate.

The portal reduces manual data entry and duplication, making lodgements easier for applicants and enabling ASIC to assess applications more efficiently. It also enhances the quality and completeness of the information ASIC is required to collect.

### **Supporting accessible registers**

ASIC's registers play a critical role in our economy by supporting the Australian financial system and businesses of all sizes, contributing substantial economic benefits. However, the processes, policies and technology that enable registry services are aged and do not meet contemporary standards for digital user experience. To address these challenges, ASIC has received a significant funding commitment to continue the RegistryConnect program.

We administer more than 30 registers, which hold essential records for every company, business name and licensed financial industry professional.

The companies and business names registers contain details of more than 3.6 million companies and 2.9 million business names.

We help regulated entities meet their compliance obligations and provide access to comprehensive registry information. Registry records are used in legal proceedings and by government for regulatory, investigative and enforcement actions.

The Registry Business Advisory Group (RBAG) provides direct consultation with users of our registry services to offer strategic insights and guide future proposals to stabilise and uplift our registers. The RBAG met five times this year and discussed strategic issues relating to future work.

Each year, we collect fees and charges associated with the registers. In 2024–25, ASIC collected fees and charges contributing over \$1.4 billion to Commonwealth revenue.

### ***Performance overview***

There were more than 298 million searches of ASIC's registers, and we received 3.3 million lodgements, with 94% submitted online. The most common lodgement was Change to company details (Form 484) with 1.1 million received. We also facilitated 333,188 new company registrations and 386,519 business name registrations. The cost of registering a business name was \$44 for one year and \$102 for three years.



Our Customer Contact Centre provides frontline support to regulated entities, business owners, consumers, digital service providers, registered agents, directors and secretaries. It handled 443,798 enquiries this year.

We have improved call centre efficiency by expanding our team of customer service officers and investing in new technology. As a result, the average time to answer calls improved to under 12 minutes in June 2025, a 52.87% reduction of time in the queue compared with the year's average.

This year, ASIC also made it easier to suppress residential addresses and other personal information from public view where this is a safety risk. Improvements to related website content have also helped to better inform and support customers.

### ***Registry employees return to ASIC***

We were pleased to officially welcome approximately 200 former Australian Taxation Office (ATO) employees on 10 April 2025, which marked the successful completion of the machinery of government change that returned responsibility for the ASIC business registers and related services and functions to ASIC. These employees continue in their roles and functions, with no changes to registry services.

## **Engagement and education**

### **Engagement with Parliament and government**

ASIC remains committed to engaging with and responding to parliamentary and other oversight and accountability bodies. Staff members from across ASIC contribute substantially to this work, in particular by preparing supporting materials for appearances at hearings and written responses to Questions on Notice from parliamentarians. This year, we attended numerous hearings, made several submissions, and responded to Questions on Notice and parliamentary inquiries across the Senate, House of Representatives and Joint Committees. For further detail, see [Appendix 2](#).

ASIC also provides advice to the Australian Government on the practical impact of policy initiatives and legislative changes to help advance the Government's law reform agenda. After reforms are enacted by Parliament, we help implement these by issuing regulatory guidance and using our regulatory and enforcement powers. We assess opportunities and risks that may affect our ability to enforce the law and offer reform recommendations aimed at improving the performance of the financial system. In 2024–25, we were actively involved in multiple reviews and reform processes, including:

- ◆ the parliamentary inquiry into the capability of law enforcement to respond to money laundering and financial crime
- ◆ the Department of Industry, Science and Resources' proposals paper for introducing mandatory guardrails for AI in high-risk settings
- ◆ the parliamentary inquiry into wealth management companies

- ◆ Treasury consultations on:
  - the statutory review of the meetings and documents amendments
  - the introduction of the Scam Prevention Framework
  - unfair trading practices.

### Engagement with key stakeholders

We are committed to working constructively and transparently with industry and the broader community, to build our understanding of complex issues, make the right regulatory decisions and set clear expectations for those we regulate. We are always mindful of the role we should play to support the economy and innovation, and reduce the regulatory burden on businesses.

In 2024–25, we continued to deepen our relationships with stakeholders in our everyday work. Our commissioners and senior leaders held a range of public speaking engagements across a variety of platforms and media, to highlight our strategic direction and clarify our regulatory and enforcement stance. We further held formal and informal listening engagements to gather and consider the views of the community.

### First Nations engagement

Our Indigenous Outreach Program is an established and specialist team working across ASIC. It provides advice, insights and support to oversee that our engagement with First Nations peoples is culturally appropriate and sensitive. It also aims to ensure that we are a trusted source of information and resources for First Nations consumers and communities through our communications channels.

The program works with industry, service providers and other government agencies to

influence system change and support positive financial outcomes for First Nations peoples. We undertook various engagement and outreach activities throughout the year to build and leverage relationships with stakeholder groups, support ASIC's enforcement outcomes and increase our awareness of the range of experiences of First Nations peoples and communities.

This year, we:

- ◆ responded to 231 enquiries from First Nations consumers and their advocates, and stakeholders working with First Nations communities through our dedicated Indigenous Help Line and email channel
- ◆ undertook regional and remote outreach work in locations such as East Arnhem Land, Katherine and Alice Springs in the Northern Territory; the Torres Strait in Queensland; the Pilbara and Kimberley regions of Western Australia; Adelaide in South Australia; Kingscliff, the mid-north coast, and south-west Sydney in New South Wales; and regional locations in Victoria and Tasmania
- ◆ participated in events such as the First Nations Foundation's Indigenous Super Summit, Northern Rivers Community Gateway Conference, Financial Counselling Australia's National Conference, NSW Fair Trading Roadshow, FCAWA's Newman Forum, and the NSW Community Voice Networks' Community Worker Forum
- ◆ continued to participate in activities as part of the National Indigenous Consumer Strategy (NICS), and through the work of the ASIC Indigenous Advisory Group, ASIC's Cross-Government Engagement Group, and various industry engagements.

### ***ASIC's Indigenous Financial Services Framework***

We have continued to progress the long-term outcomes in ASIC's Indigenous Financial Services Framework, including maintaining the following dedicated engagement streams with their specific objectives.

- ◆ **ASIC Indigenous Advisory Group** – This dedicated forum comprises First Nations peoples from various locations and with a range of personal and professional experience (see Panels section for more details on this group).
- ◆ **ASIC's Cross-Government Engagement Group** – The functions and responsibilities of this network of federal agencies are aligned to ASIC's Indigenous Financial Services Framework outcomes. The aim of this group is to identify opportunities for agencies represented to collaborate on addressing key challenges for Indigenous consumers; share insights and data; and join together for engagement and outreach to communities. In 2024–2025, we facilitated five Cross-Government Engagement Group meetings with 12 external speakers on topics that align with the framework's long-term outcomes.
- ◆ **Financial services industry engagement** – We continue to engage with sectors of the financial services industry on opportunities to address key challenges experienced by First Nations consumers, including access to banking products and services, superannuation death benefits claim handling, appropriate credit provision, and best practice engagement approaches with First Nations customers.

### **Panels**

We take a consultative approach to addressing harms and emerging developments in Australia's financial system. ASIC hosts the following consultative committees and forums:

- ◆ ASIC Consultative Panel (ACP)
- ◆ ASIC Consumer Consultative Panel
- ◆ ASIC Indigenous Advisory Group
- ◆ Corporate Governance Consultative Panel
- ◆ Cyber Consultative Panel
- ◆ Digital Finance Advisory Panel
- ◆ Fixed Income, Currencies and Commodities (FICC) Markets Consultative Panel
- ◆ Financial Advisers Consultative Panel
- ◆ Markets Consultative Panel
- ◆ Registry Business Advisory Group (RBAG).

### ***ASIC Consultative Panel***

The ACP is ASIC's strategic consultative body. It assists ASIC to meet its objectives, including through consulting on proposed regulatory changes, sharing intelligence on the external environment and market conditions, and providing input into ASIC's strategic and forward planning. Panel members are preeminent representatives of the academic, consumer, industry, legal and regulatory sectors and are appointed in their personal capacity.

We held two ACP plenary meetings in 2024–25 to consider changing market conditions and to discuss topics such as the evolution in capital markets and ASIC's regulatory simplification workstream. We also met with targeted groups of ACP members with expertise in areas including financial hardship; the environment, social and governance (ESG) practices; the payments

system; and the digital economy. Members were also consulted on a range of specific issues and spoke at ASIC events to share their expertise, including the ASIC Annual Forum.

### ***ASIC Consumer Consultative Panel***

Established in November 1998, the ASIC Consumer Consultative Panel provides ASIC with information and intelligence on current and emerging consumer issues affecting consumers of the financial products and services ASIC regulates. The panel met in person three times in 2024–25, including in a joint session with the ACCC’s equivalent consumer panel, the Consumer Consultative Committee. The panel members’ priority focus areas included:

- ◆ informing ASIC’s enforcement initiatives, including in relation to predatory lending practices and the mis-selling of financial products
- ◆ engaging on various areas of current law reform, including scams and the implementation of the buy now pay later reforms
- ◆ the effectiveness of industry codes
- ◆ cost-of-living pressures and lender hardship responses experienced by consumers
- ◆ financial services issues faced by First Nations peoples and communities, including banking access, digital exclusion and the need for greater support from superannuation funds
- ◆ general insurance claims handling, including insurers’ responses to natural disasters.

### ***ASIC Indigenous Advisory Group***

The ASIC Indigenous Advisory Group comprises First Nations peoples from various locations and with a range of personal and professional experience. The group supports ASIC to build our understanding of the diverse needs, experiences and priorities of First Nations consumers engaging with the financial system. Members provide advice, guidance and insights on key challenges, emerging themes and community priorities for First Nations consumers and communities, consistent with ASIC’s statutory mandate, and with a focus on activities and stakeholders regulated by ASIC. This enables ASIC to prioritise, elevate and position First Nations peoples’ views and experiences as part of our regulatory role, strategic priorities and operational activities.

In 2024–25, this group met three times. It discussed longstanding and emerging challenges for First Nations consumers, such as banking accessibility, the impacts of high-cost credit products and low-value insurance products, and the barriers to First Nations consumers’ effective engagement with superannuation funds and associated products.

### ***Corporate Governance Consultative Panel***

The Corporate Governance Consultative Panel was established in 2020 to enable ASIC to gain a deeper understanding of ongoing and emerging issues in corporate governance practices. Panel members include listed company directors, industry association representatives, institutional investors and academics.

The panel continued to meet twice during 2024–25. It discussed ASIC's review on the use and adoption of AI by licensees, ASIC's guidance on the mandatory climate disclosure regime, the aims of ASIC's Simplification Group, and the changing dynamic between public and private markets.

### ***Cyber Consultative Panel***

The Cyber Consultative Panel is an independent group that advises ASIC on our supervisory approach to building the cyber resilience of financial services and markets, and shares views on intelligence, trends and emerging threats. The panel met this year in May.

We engaged with this panel on ASIC's strategic approach to external cyber supervision, ASIC's approach to cyber awareness and capability uplift of regulated entities, lessons learnt from recent cyber incidents in the superannuation sector, and third-party and outsourcing cyber and operational resilience challenges.

### ***Digital Finance Advisory Panel***

The Digital Finance Advisory Panel was established in 2015 to help inform ASIC's financial technology (fintech) and regulatory technology (regtech) approach, and to maintain engagement with the sector. Panel members are drawn from a cross-section of the fintech and regtech communities, academia and industry associations. The panel also includes active observers from government and regulatory agencies, who facilitate dialogue between industry and the public sector. The panel provides a network for domestic departments and agencies dealing with innovative businesses, promoting a coordinated approach to financial innovation and regtech. It informs ASIC's engagement with the fintech and regtech

sectors. During 2024–25, it explored topics such as operating challenges facing fintechs and regtechs, crypto-assets, payments reforms, the Consumer Data Right, central bank digital currencies and developments in AI use.

### ***Fixed Income, Currencies and Commodities Markets Consultative Panel***

The Fixed Income, Currencies and Commodities (FICC) Markets Consultative Panel is an independent group of senior members from the financial services industry. The panel advises ASIC on its approach to fulfilling its responsibilities for supervision and surveillance of Australian FICC markets, and on broader market developments. During 2024–25, the FICC Markets Consultative Panel met twice. Issues discussed included public and private market dynamics, regulatory simplification, market cleanliness, cyber resilience and bond market transparency.

### ***Financial Advisers Consultative Panel***

The Financial Advisers Consultative Panel contributes to ASIC's understanding and capacity to identify and respond to emerging trends in the financial advice industry. The panel met three times in 2024–25, with a mix of in-person and remote attendees.

Discussion topics included the life insurance sector, artificial intelligence and private credit funds. The panel also discussed internal dispute resolution data reporting, Delivering Better Financial Outcomes Package Tranche 1 and the registration of relevant providers.

### *Markets Consultative Panel*

The Markets Consultative Panel is an independent group of senior members from the financial services industry focusing on exchange markets. It advises ASIC on its approach to its responsibilities for the day-to-day supervision of the Australian market and on broader market developments. The panel met four times in 2024–25. Issues discussed included market conditions and challenges; public and private market dynamics; listed market impacts and responses to the growth of private capital; proposed amendments to the trading infrastructure and automated trading obligations for securities and futures participants; share sale fraud; exchange market stress controls; and regulatory simplification.

### *Registry Business Advisory Group*

The Registry Business Advisory Group (RBAG) provides direct consultation with users of our registry services to offer strategic insights and guide future proposals to stabilise and uplift our registers. The RBAG met five times this year and discussed strategic issues relating to future work.

### **Improving stakeholder engagement through better regulatory efficiency**

ASIC continues to provide details of significant regulatory activities for inclusion in the Government's Regulatory Initiatives Grid (RIG), which provides a multi-agency view of significant regulatory activities in the financial sector over a rolling 24-month period. These inputs to the RIG help provide enhanced efficiency for industry in planning and allocating resources. They also enable ASIC to better coordinate or sequence regulatory activities in this sector with those of other agencies.

### **Regional engagement program**

ASIC regularly engages with stakeholders across Australia through our regional engagement program. Led by our Regional Commissioners, this engagement is mainly facilitated through State and Territory Regional Liaison Committee meetings attended by ASIC Commissioners and by a range of industry and consumer representatives in each location. The committees meet throughout the year to provide local insights and discuss current and emerging issues.

In 2024–25, 17 face-to-face regional liaison meetings were held across Australia. Themes and issues discussed included the increasingly sophisticated nature of scams and financial fraud, and the challenges for businesses and consumers in detecting and preventing scams. Cost-of-living pressures were a consistent theme, with input costs and staff shortages impacting small businesses in particular. Feedback about insurance affordability and poor claims handling processes highlighted the need for better communication and support from insurers. The impact on Indigenous communities and consumers from regional bank closures and digitisation of banking processes – including identity verification – was also discussed.

Our regional engagement program also involves direct engagement with community organisations and businesses. Last year, ASIC Chair Joseph Longo visited two remote First Nations communities, Galiwin'ku and Milingimbi, and participated in an ANZSOG National Regulators Community of Practice panel event with the Office of the Registrar of Indigenous Corporations and the Australian Charities and Not-for-profits Commission to discuss how the agencies can support First Nations Australians to build strong, equitable and sustainable communities. Commissioner Kate O'Rourke also



participated in roundtable discussions in Darwin that focused on financial inclusion and remote banking challenges.

Regional Commissioners also met with regional liaison leaders at the Reserve Bank of Australia, to discuss trends and share insights gathered from each agency's stakeholder meetings.

Our regional engagement program continues to be an important part of our stakeholder interactions, informing our business planning and broader ASIC activities.

### International engagement

ASIC engages closely with international regulators and agencies to advance global regulatory policy, facilitate cooperation and influence standards. Through our international engagement, ASIC captures vital intelligence that enables us to identify trends and emerging risks in financial markets, and enhances our ability to regulate effectively.

In 2024–25, we made 187 international cooperation requests and received 284 in relation to activities such as surveillance, supervision, enforcement, research and licensing. This included 181 international requests for assistance in enforcement matters, of which 19 requests (including supplementary requests) sought ASIC's assistance to compel materials from third parties under the *Mutual Assistance in Business Regulation Act 1992*.

We participated in a range of international forums. For example, ASIC is a board member of the International Organization of Securities Commissions (IOSCO) and is represented on its policy committees and taskforces, including those examining issues around retail investor protection such as tackling investment scams with platform providers, financial stability,

sustainable finance, asset management, crypto-assets, technology, market fragmentation, enforcement, consumer protection, emerging risks and standards implementation.

As part of IOSCO, ASIC:

- ◆ is Vice-Chair of the Asia-Pacific Regional Committee
- ◆ is Chair of the Committee on Regulation of Market Intermediaries
- ◆ is a member of the Fintech Task Force
- ◆ is a member of the Sustainable Finance Task Force
- ◆ actively participates in the Asia-Pacific Regional Committee, including leading regional initiatives on scams.

ASIC is also a member of:

- ◆ the International Association of Insurance Supervisors' Market Conduct Working Group
- ◆ the International Financial Consumer Protection Organisation, and participates in the G20/Organisation for Economic Co-operation and Development (OECD)'s Financial Consumer Protection Task Force initiatives
- ◆ the Global Financial Innovation Network, which is committed to supporting financial innovation and providing a more efficient way for innovative fintech and regtech firms to interact with regulators
- ◆ the Corporate Registers Forum (CRF), an international association of corporate registries, government agencies and officials, and an elected member of the CRF Executive Committee.



ASIC negotiates memorandums of understanding (MOUs) with international regulatory agencies to foster coordination, cooperation and information sharing, and reflect agencies' intentions to maintain proactive, open and collaborative relationships. In 2024–25, ASIC signed an MOU with the Vietnam State Securities Commission to support information sharing arrangements under a formalised capacity-building program supported by the Department of Foreign Affairs and Trade (DFAT).

ASIC supports whole-of-government priorities in the region by participating in capacity-building activities with peer regulators overseas. In 2024–25, ASIC continued its training program with the State Securities Commission of Vietnam, supported by DFAT. ASIC also participated in capacity-building activities with Otoritas Jasa Keuangan in Indonesia, working with other Council of Financial Regulator agencies to deliver training and share technical expertise.

Throughout 2024–25, ASIC continued to support DFAT in negotiations for free trade agreements with multiple countries.

### **Innovation Hub**

As part of our approach to supporting responsible innovation, we established our Innovation Hub in 2015, to help innovative Australian fintech and regtech businesses navigate the regulatory framework. The hub also provides a platform for domestic and international engagement on fintech and regtech developments.

### ***Informal assistance and guidance***

In 2024–25, ASIC staff met with representatives of 49 innovative businesses to help them understand how the regulatory framework may apply to their intended business models. The Innovation Hub also observed 21 regtech demonstrations over the year. Some proposed business models involved payments, credit, services related to crypto-assets, and services that use a range of different technologies. During the financial year, ASIC granted three licences to new innovative businesses, which included those offering services in payments and crypto-assets. Fintech businesses that received informal assistance from our Innovation Hub before submitting their licence applications were consistently approved faster than those that did not seek assistance.

### ***Enhanced regulatory sandbox***

The enhanced regulatory sandbox (ERS) administered by the Innovation Hub and the Licensing team enables eligible businesses to test certain innovative financial services or credit activities for up to 24 months without first obtaining an AFS or credit licence. The ERS allows ASIC to facilitate innovation while ensuring consumer and investor protection. In 2024–25, six entities tested their business models in the ERS. The business models tested included a green loan provider and several payment facilities, some of which use blockchain technology.

### ***Domestic and international engagement***

In 2024–25, the Innovation Hub hosted four Digital Finance Advisory Panel (DFAP) meetings with a variety of stakeholders hailing from the fintech and regtech sectors. ASIC is one of 10 coordination group members of the Global Financial Innovation Network, which has over

70 members, including regulators, government bodies and international organisations. ASIC is also a member of the steering group for the IOSCO Fintech Task Force, and a member of the IOSCO working groups on AI, Asset Tokenisation, and the implementation of IOSCO's recommendations in its *Crypto and Digital Assets and Decentralised Finance* reports..

### Small business engagement

ASIC is highly committed to supporting small businesses and protecting their interests. We engage regularly with current and prospective small business owners, other government agencies, industry associations, and small business advisory and counselling services to exchange insights, address challenges and promote compliance within our remit.

In 2024–25, ASIC took part in approximately 100 small business events and meetings, engaging with stakeholders across every state and territory. Demonstrating our strong national presence and commitment to engaging small businesses where they live, we connected with communities in Hobart, Launceston, Alice Springs, Katherine, Nhulunbuy, Darwin, Sydney, Wollongong, Brisbane and Perth.

We participated in events such as Indigenous Business Month, New South Wales Small Business Month, the Northern Territory's October Business Month, and the Tasmanian Small Business Expo, where we provided guidance to attendees. In the Northern Territory and Queensland, we contributed to panels on supporting small businesses and Aboriginal and Torres Strait Islander directors. In Victoria, we joined a roundtable on tackling financial abuse in small business, and Commissioner Kate O'Rourke participated in a national webinar on ASIC's role in supporting the sector.

We support inclusive consultation and stakeholder feedback to develop and deliver information to small business audiences through our website, news articles, social media and newsletters. This informative approach has led us to producing targeted publications on scams, sustainability reporting, and managing company money and assets.

See [News article](#) 'ASIC warns small businesses to be on high alert for scams', 22 October 2024.

See [News article](#) 'What small businesses need to know about sustainability reporting requirements', 31 March 2025.

See [News article](#) 'ASIC reminds small business directors of their obligations to manage company money and assets appropriately', 12 May 2025.

### Educating consumers

Consumer education is an important part of ASIC's remit. This year, there were around 11.7 million visitors to ASIC's Moneysmart website, and approximately 8.1 million users of Moneysmart online tools.

The most used tools on Moneysmart were the income tax calculator (3.7 million views) and mortgage calculator (3.0 million views).

### Financial education

ASIC's Moneysmart program provides free and independent financial information and tools to help consumers and investors build confidence. Moneysmart is a leading source of trusted, independent information for Australians, with more than 11 million visitors to the Moneysmart website last year.

ASIC has taken an audience-led approach to refreshing the retirement resources on the Moneysmart website to support Australians to plan for the retirement phase of superannuation.

Government has provided funding to expand and refresh the resources available on the Moneysmart website, ensuring easy access to independent and reliable information on superannuation and retirement options. It will also provide enhanced tools to make retirement decisions easier and more accessible.

In addition, ongoing funding has been provided by Government for a consumer education campaign to raise awareness about superannuation for people planning for and in retirement.

#### ***Helping young Australians make decisions about superannuation***

In September, Moneysmart launched the 'Get your super working overtime' consumer education campaign. The campaign aimed to raise awareness about the long-term benefits of engaging with superannuation early among Australia's millennial population. It directed consumers to Moneysmart for further information enabling them to make informed decisions and take actions with their superannuation (e.g. review fees, investment options, make sure it is being paid by your employer).

The campaign:

- ◆ reached more than 11 million Australians through media relations
- ◆ secured over 3.2 million impressions across Facebook and Instagram
- ◆ achieved 1.6 million impressions across broadcast video on-demand advertising.

#### ***Supporting consumers to make informed financial decisions***

Through Moneysmart's digital channels, we supported several regulatory reports to help consumers understand their rights and make informed decisions. This included:

- ◆ ASIC's report on better banking for First Nations consumers, helping them understand how they could save on bank fees. This was supported through a Google search campaign to raise awareness that low-fee transaction account options are available, and encouraged consumers to request an account suitable for their needs. Over 21,000 online users were driven to Moneysmart as a result of the Google search campaign
- ◆ ASIC's report into death benefit claims handling through superannuation, publishing information on protecting your superannuation after death through binding nominations, which was viewed more than 4,300 times
- ◆ Moneysmart's published information to help consumers manage the cost of living and review their mortgage interest rate following the two interest rate reductions announced by the Reserve Bank in February and May 2025.

### ***Moneysmart social media***

ASIC continued to use social media to connect Australians with Moneysmart's free tools and guidance, helping people build financial confidence in their everyday decisions.

Over the past year, Moneysmart content reached an average of 46,000 consumers daily across Facebook, Instagram and X. Engagement was highest on content that helped people navigate the financial realities facing many Australians, including managing rising living costs, navigating superannuation and retirement planning, and understanding investment risks. Content designed to demystify common financial challenges – such as setting a budget, managing superannuation or choosing a savings account – continued to perform strongly, with users responding positively to relatable, accessible advice.

### ***Moneysmart's future direction***

Building on the strong foundations of Moneysmart established over a quarter of a century, ASIC is in the early stages of developing a program of work to maintain Moneysmart's ongoing relevance and support for consumers. This digitally led work is aiming to help consumers and investors at moments that matter to them and to boost their confidence in making financial decisions.

## Unclaimed money

ASIC is responsible for administering money held in bank accounts, shares, investments and life insurance policies, which is lost or unclaimed for a certain period of time. We receive this unclaimed money, on behalf of the government, from authorised deposit-taking institutions under section 69 of the *Banking Act 1959*; life insurance companies and friendly societies under section 216 of the *Life Insurance Act 1995*; and companies with unclaimed money under various sections of the Corporations Act. As at 30 June 2025, \$2.6 billion of unclaimed money vested with the Commonwealth, and \$110 million of unclaimed money vested in ASIC's trust account, giving a total of \$2.7 billion.

We reunite people with their unclaimed money by maintaining a publicly accessible register, allowing individuals and entities to search for lost funds at any time, with no time limit for submission of claims. Claims are processed and paid to their rightful owner, promptly and in accordance with applicable legislation. By doing so, we support economic growth and contribute to improved living standards for all Australians.

During 2024–25, ASIC received \$436.2 million in unclaimed money compared with the \$480.8 million received in 2023–24. The funds are transferred overnight to the Official Public Account (OPA) without accruing interest.

**Table 3—Unclaimed money received by type**

LODGEMENTS BY TYPE	2024–25 (\$)			2023–24 (\$)
	Principal	Interest	Total	Total
Company	136,267,584	N/A	136,267,584	141,524,351
Banking	230,492,021	N/A	230,492,021	294,447,871
Life insurance	69,406,646	N/A	69,406,646	44,795,856
<b>Total</b>	<b>436,166,251</b>	<b>N/A</b>	<b>436,166,251</b>	<b>480,768,078</b>

Unlike the above three lodgement types, deregistered company trust money is not swept to the OPA. These funds are trust funds held and managed by ASIC under a special account for the purposes of dealing with funds received by ASIC under the provisions of section 601(1A) of the Corporations Act. During 2024–25, ASIC received \$54.9 million and earned \$3.2 million in interest. This money remains in trust and is not available to ASIC to fund its operations. Table 4 shows funds received during the financial year.

**Table 4—Amount received and held by ASIC Trust account**

LODGEMENTS BY TYPE	2024–25 (\$)			2023–24 (\$)
	Principal	Interest	Total	Total
Deregistered company trust money	54,887,481	3,230,212	58,117,693	29,782,172

ASIC's register of unclaimed money is publicly available. Claims are typically processed within 60 days upon receipt of all necessary documentation. On average, claims were processed within 60 calendar days of receiving all necessary documentation. The performance measure was met throughout 2024–25, except in March and June, when increased lodgement volumes temporarily extended processing times beyond the 60-day target.

Interest applied on unclaimed money is based on the March-to-March CPI, which is disclosed on the ASIC Moneysmart website.

ASIC paid claims and interest totalling \$169.3 million in 2024–25, compared with \$174.7 million in the previous year (these are combined totals of figures in both Table 5 and Table 6). Interest is not payable in respect of claims in Table 6.

**Table 5—Amount paid to owners of unclaimed money from the Official Public Account**

CLAIMS BY TYPE	2024–25 (\$)			2023–24 (\$)
	Principal	Interest	Total	Total
Company	43,715,283	3,226,896	46,942,179	51,665,917
Banking	90,677,034	8,036,674	98,713,708	105,781,604
Life insurance	15,160,982	1,194,575	16,355,557	9,357,104
<b>Total</b>	<b>149,553,299</b>	<b>12,458,145</b>	<b>162,011,444</b>	<b>166,804,625</b>

**Table 6—Amount paid to owners of unclaimed money from ASIC Trust account**

CLAIMS BY TYPE	2024–25 (\$)			2023–24 (\$)
	Principal	Interest	Total	Total
Deregistered company trust money	7,328,797	N/A	7,328,797	7,890,311

# Key activity metrics

Table 7 provides an overview of our performance against the key activity metrics for 2024–25. Some of these metrics were committed to in the 2024–25 Corporate Plan Performance Chapter under 'Performance measures' and others are additional to provide a comprehensive picture of ASIC's performance across the key activities. As we mature our approach to reporting, only those measures published in the 2025–26 Corporate Plan will be reported as part of the 2025–26 Annual Performance Statements.

The number of supervisory, surveillance and enforcement actions we undertake, the value of fines and penalties, and the number of convictions vary from year to year. The variations depend on factors such as the severity of breaches of the law and the complexity of the investigations we undertake.

**Table 7—Key activity metrics**

OUTCOME	TOTAL 2024–25	TOTAL 2023–24
<b>Surveillance</b>		
Surveillances completed <sup>1</sup>	829	690
Instances of potentially misleading or deceptive promotional material withdrawn or amended	14	22
Interim stop orders and final stop orders on disclosure documents <sup>2</sup>	4	5
Stop orders under design and distribution obligations <sup>3</sup>	4	7
<b>Scam disruption</b>		
Investment scam and phishing website takedowns <sup>4</sup>	Over 6,900	Over 7,300

- 1 The number of surveillances completed is a measure of surveillance activity or activities by an entity or related entities (such as companies, partnerships, licensed or unlicensed entities, and individuals), by disclosure documents (prepared by an entity or entities) or by transactions (by an entity or entities). These surveillance activities can be initiated on a reactive basis (e.g. in response to a report of misconduct or industry intelligence) or proactively as part of a larger surveillance project examining a thematic or industry-wide issue (i.e. a project may comprise a number of surveillances).
- 2 These stop orders were issued to prevent offers being made under disclosure documents containing misleading or deceptive statements, and omissions of information required under relevant legislation.
- 3 These stop orders were issued under ASIC's design and distribution obligations powers, which came into effect in October 2021, following a transitional period.
- 4 ASIC's scam website takedown capability was launched in July 2023. Facilitated by a third party specialising in cybercrime detection and disruption, it eliminates or limits exposure of Australian investors to investment scam and phishing websites.



OUTCOME	TOTAL 2024-25	TOTAL 2023-24
<b>Enforcement and compliance</b>		
<b>Investigations</b>		
Preliminary investigations commenced	430	284
Formal investigations commenced <sup>5</sup>	252	168
<b>Criminal actions</b>		
Criminal litigation completed	25	24
Criminal litigation completed successfully (as a percentage)	90%	90%
New criminal litigation commenced	24	23
Average time to complete an investigation (in months)	23	25
Average time to a criminal court decision (in months)	34	26
Average total time to complete an investigation and reach a court decision (in months) <sup>6</sup>	70	56
<b>Criminal outcomes</b>		
Number of people/companies convicted	19	18 <sup>7</sup>
Custodial sentences (including fully suspended)	14	8
Non-custodial sentences/fines	5	10
Total dollar value of fines	\$16.8m <sup>8</sup>	\$936,000
Total dollar value of pecuniary penalties	\$20,000	-
<b>Civil action</b>		
Civil litigation completed	46 <sup>9</sup>	39
Civil litigation completed successfully (as a percentage)	95%	82%
New civil litigation commenced	101 <sup>10</sup>	69
Average time to complete an investigation (in months)	18	15

5 Investigations for these purposes meet the definition in section 13 of the ASIC Act and section 247 of the National Credit Act.

6 The time to complete criminal investigations is measured from the date an investigation commences to the date a referral is made to the Commonwealth Director of Public Prosecutions (CDPP). The time to reach a criminal court decision is measured from the date charges are laid by the CDPP to the date a sentence is handed down. The time involved in achieving enforcement outcomes can vary, depending on many factors, such as the time a matter is with the CDPP for assessment and the time a matter is before the courts.

7 This includes three successful criminal actions without a conviction recorded.

8 The increase in fines arising from criminal actions in 2024-25 is attributed fines of \$13.5 million against Allianz Australia Insurance Limited and \$3.3 million against AWP Australia Pty Ltd for making false or misleading statements (25-028MR).

9 Civil litigation completed reflects actions against individual defendants. In 2024-25, ASIC filed a proceeding to wind-up 95 companies on just and equitable grounds (25-052MR). Although multiple defendants were involved, this has been counted as one action in the reported figure.

10 In 2024-25, ASIC filed a proceeding to wind-up 95 companies on just and equitable grounds (25-052MR). Although multiple defendants were involved, this has been counted as one action in the reported figure.

OUTCOME	TOTAL 2024-25	TOTAL 2023-24
Average time to reach a civil court decision (in months)	9	27
Average total time to complete an investigation and reach a court decision (in months) <sup>11</sup>	27	46
<b>Civil outcomes</b>		
Total dollar value of civil penalties	\$104.1m	\$90.8m
<b>Administrative actions and outcomes<sup>12</sup></b>		
Actions taken against auditors	51	52
Actions taken against liquidators	-	2
People disqualified or removed from directing companies	14	35 <sup>13</sup>
People/companies removed, restricted or banned from providing financial services	58	64
People/companies removed, restricted or banned from providing credit services	33 <sup>14</sup>	11
Public warning notice	-	-
<b>Financial Services and Credit Panel outcomes</b>		
Directions issued	6	6
Reprimands issued	5	4
Warnings issued	1	1
Registration Prohibition Orders	1	2
Registration suspension order	1	-
<b>Court enforceable undertakings</b>		
Court enforceable undertakings accepted	3	7

11 The time to complete civil investigations is measured from the date an investigation commences to the date initiating proceedings are filed by ASIC. The time to civil court decisions is measured from the date initiating proceedings are filed to the date a judgment is handed down. Often judgments are reserved, which affects the overall time to reach a court decision.

12 This includes all disqualifications, suspensions, cancellations and bannings resulting from surveillance and enforcement activities.

13 This includes four disqualifications arising from civil proceedings, where the court ordered that the defendant be disqualified from directing companies.

14 The increase in the number of entities removed from providing credit services is primarily due to referrals from the Australian Financial Complaints Authority and notifications from the Compensation Scheme of Last Resort.

OUTCOME	TOTAL 2024-25	TOTAL 2023-24
<b>Infringement notices<sup>15</sup></b>		
Total number of infringement notices issued	16	26
Total dollar value of infringement notices	\$5.6m	\$7.2m
<b>Summary prosecutions</b>		
Summary prosecutions for strict liability offences	235	186
Total value of fines and costs	\$1.6m	\$1.1m
<b>Guidance</b>		
Industry reports published	27	18
New or revised regulatory guides published	49	30
New or revised information sheets	87 <sup>16</sup>	34
Legislative instruments made, amended and repealed	55	88
<b>Licensing and professional registration activities</b>		
<b>Administrative decisions</b>		
Licensing and registration applications received	1,531	1,531
Licensing and registration applications approved	1,021	1,116
Licensing and registration applications refused or withdrawn	360	385
Licensing and registration applications in progress	818	626
<b>Australian financial services (AFS) licences, including limited AFS licences (new and variations)</b>		
Applications approved	678	679
Applications refused/withdrawn	214	195
Licences cancelled/suspended	215	269
Applications in progress	554	457
<b>Australian credit licences (new and variations)</b>		
Applications approved	173	239
Applications refused/withdrawn	111	133
Licences cancelled/suspended	253	204
Applications in progress	224	113

15 These notices were issued for infringements related to the market integrity rules and the ASIC Act. Compliance with infringement notices is not an admission of guilt or liability and these entities are not taken to have contravened the law. The figure includes infringement notices issued by ASIC and infringement notices issued by the Markets Disciplinary Panel (MDP).

16 A substantial number of information sheets were updated during this financial year, which has resulted in the publication of a greater number of revised information sheets.

OUTCOME	TOTAL 2024-25	TOTAL 2023-24
<b>Registered auditors – registered company auditors, authorised audit company and self managed superannuation fund (SMSF) auditors</b>		
Applications approved	170	198
Applications refused/withdrawn	35	57
Licences cancelled/suspended	543	560
Applications in progress	40	56
<b>Registered liquidators</b>		
Liquidators registered by ASIC	27	17
Registration committees convened during the year	25	24
<b>Outcome of Liquidator Registration Committee convened during the year</b>		
Applications for registration approved by committee <sup>17</sup>	20	15
Applications for registration refused by committee	1	1
Committee matters in progress – registration application yet to be determined	4	8
<b>Engagement</b>		
Consultation papers published	20	14
Meetings with industry groups and other stakeholders	Over 1,400	Over 1,200
<b>Regulatory relief</b>		
<b>Applications for relief from the Corporations Act</b>		
Relief applications received	1,106	1,085
Relief applications approved	859	886
Relief applications refused or withdrawn	214	135
Relief applications in progress	97	39
<b>Education</b>		
Users visiting ASIC's Moneysmart website	11.7m	11.8m
Number of users who have used a Moneysmart online tool	8.1m	6.2m

17 A breakdown of the applications approved by the Liquidator Registration Committee, with or without conditions, can be found in the section on [Liquidator Registration and Disciplinary Committees](#).

# Strategic work across our regulated sectors

## Superannuation

ASIC is responsible for regulating conduct in the superannuation industry, including the conduct and disclosure obligations of trustees of registrable superannuation entities (RSEs). Our work is focused on trustee conduct that affects superannuation fund members.

During 2024–25, we focused on improving the delivery of retirement outcomes and member services by superannuation funds, in line with our third strategic priority of better retirement outcomes and member services. Work mainly focused on death benefit claims and monitoring trustees' implementation of the retirement income covenant (see [Strategic Priority 3](#)).

Additionally, ASIC completed a review into the scam prevention, detection and response processes of 15 superannuation trustees. At the completion of this project, we wrote to the CEOs of all superannuation trustees, highlighting the need for action by the industry. ASIC expects all superannuation trustees to complete a review of their scam and fraud prevention, detection and response capabilities, and to address any risks and weaknesses.

## Credit and banking

The credit and banking sector includes authorised deposit-taking institutions (banks and credit unions), credit providers (bank and non-bank) and lessors, credit intermediaries

(including mortgage and finance brokers), payment services providers, traditional trustee companies and debt management firms.

ASIC's work in this sector in 2024–25 included reviewing consumer leases and small amount credit contracts to test compliance with recent reforms, and reviewing lender approaches to financial hardship. Speaking at the Australian Finance Industry Association Risk Summit in June, for example, ASIC Commissioner Alan Kirkland emphasised the priority ASIC places on consumer credit protection within the context of continuing cost-of-living pressures on Australians – noting that predatory lending in particular will continue to be a focus of ASIC's work.

We also continued to engage across the banking sector to encourage banks to address nationwide financial harm to low-income customers through fees incurred on transaction accounts, take more effective approaches to account migration, and improve processes so that basic, no-fee or low-fee accounts are accessible to low-income customers (see further information on consumer leases and small amount credit under [Strategic Priority 1](#)).

ASIC also continued its focus on scams, examining the prevention, detection and response processes of 15 banks outside the four major banks.

**CASE STUDY 18:****Anti-scam practices of banks outside the four major banks**

ASIC continued its focus on scams by examining the scam prevention, detection and response processes of 15 banks outside the four major banks. The review followed ASIC's 2023 report covering the anti-scam practices of the four major banks [Report 761](#) *Scam prevention, detection and response by the four major banks*.

We found the scam detection, prevention and response practices of the reviewed banks to be less mature than we expected. In particular, we identified:

- ◆ governance and reporting tended to be fraud-focused, as only one-third of banks had an organisation-wide scam strategy and many did not have an organisation-wide policy for determining reimbursement
- ◆ inconsistent capabilities to hold or delay potential scam payments across payment channels
- ◆ a lack of protection against brand misuse across all telecommunication channels
- ◆ poor customer experiences and outcomes due to lack of resourcing and customer focus
- ◆ the adoption of inconsistent and narrow approaches when considering liability.

We found that the majority of banks had begun or accelerated work focused on combating scams at the time of our review, in part driven by the release of Report 761, alongside the announcement of the government's intended Scams Prevention Framework and work by industry bodies. However, in light of the nature and scale of scams, we ultimately expected that more action would have been taken sooner.

Analysis of the banks' scam case data found that they detected and stopped 19% of scam transactions by value in the 2022–23 financial year. However, detection and stop outcomes varied significantly across the banks. In addition, bank customers bore the brunt of scam losses (that is, scam transactions by customers less amounts detected and stopped and recovered), footing the bill for 96% of total scam losses over the period. We published the findings of our review on 20 August 2024 in [Report 790](#) *Anti-scam practices of banks outside the four major banks*.

ASIC expects banks and other financial institutions of all sizes to consider the set of foundational anti-scam practices outlined in the report and take action to prevent and detect scams. Disrupting investment scams remains a key priority for ASIC and we continue to engage with banks and broader industry in relation to their anti-scam practices.

## Insurance

The insurance sector comprises life and general insurance companies, including insurance product providers (including friendly societies), insurance product distributors, risk management product providers and claims handling and settling services providers.

Following our review of life insurers' and friendly societies' (life companies') disclosure and marketing materials around premiums increases, we sent a letter, jointly with APRA, to life companies regarding meeting their legal obligations and consumer expectations.

ASIC also conducted a review of the direct sale of life insurance products.

For general insurance, ASIC's work focused on investigating the internal dispute resolution practices of general insurers and how these organisations had addressed areas for improvement identified in [Report 768 Navigating the storm: ASIC's review of home insurance claims](#).

For more detail on how we work to improve consumer outcomes within insurance, see Insurance under [Strategic Priority 1](#).

## Financial advice

The financial advice sector covers AFS licensees and their representatives that provide personal advice to retail clients on financial products, general advice, and personal advice to wholesale clients. ASIC's work in this sector during 2024–25 included a review of SMSF advice and related AFS licence policies and procedures, a surveillance to assess how AFS licensees and financial advisers manage the risks of using offshore service providers, reviewing AFS licensee's compliance with the reportable situations regime, and internal dispute resolution obligations.

This year, we provided guidance and education to financial advisers and AFS licensees about their legal obligations and have continued to support the implementation of government reforms and contributed to policy development (see [Case study 19](#)).



**CASE STUDY 19:****Financial advice reforms**

Since 1 January 2019, specific professional standards have applied to financial advisers. One of these relates to the completion of an approved degree or qualification to meet the qualifications standard, with requirements differing depending on an adviser's individual circumstances (for example, existing providers have until 1 January 2026 to meet this standard). AFS licensees are obliged to notify ASIC about a financial adviser's relevant qualifications and training, including whether they have been approved by the Minister. This information is recorded on the Financial Advisers Register, which consumers and industry rely on when deciding which advisers to engage with.

In July 2024, ASIC published a media release calling on AFS licensees to correct information on the Financial Adviser Register – in particular, on the qualifications held by relevant providers and whether they meet the qualifications standard. ASIC conducted a spot check that revealed errors and inconsistencies in the way this information was being entered into the register by AFS licensees. This included

qualifications and training courses being marked as 'approved' when, in many cases, this was incorrect.

We recognised the need to provide industry with some worked examples on how to assess qualifications. We prepared five examples covering various scenarios and undertook targeted consultation to refine the guidance. To supplement this, ASIC also ran a webinar for industry where we provided real-time practical guidance by stepping through a qualification assessment and how this information should be recorded on the Financial Adviser Register. We expect this guidance will continue to be helpful for industry in the lead-up to the 1 January 2026 deadline, when all existing providers must meet the qualifications standard.

See [Media release 24-142MR](#) 'ASIC urges AFS licensees to correct records on the Financial Advisers Register', 1 July 2024.

See [News article](#): 'ASIC renews warning for AFS licensees ahead of deadline for financial advisers', 3 June 2025.

We also issued warning notices to social media 'finfluencers' suspected of unlawfully promoting high-risk financial products and unlicensed financial advice, as part of a broader international crackdown. We provided information to warn consumers of the risks of unauthorised and misleading finfluencer content (see [Case study 20](#)).

**CASE STUDY 20:****Global week of action against unauthorised finfluencers**

In June 2025, ASIC and regulators from the United Kingdom, United Arab Emirates, Italy, Hong Kong and Canada took coordinated actions to crack down on unauthorised finfluencers.

Following the issuance of [Information sheet Sheet 269](#) *Discussing financial products and services online*, in 2022, we saw a noticeable drop in social media posts spruiking financial products and services by unauthorised finfluencers.

More recently, we've seen a rise in a different type of finfluencer. They position themselves as so-called trading experts, providing unauthorised financial product advice and promoting complex, high-risk investment products such as contracts for difference (CFDs). Their social media content is often accompanied by misleading or deceptive representations about the prospects of

success that the promoted products or trading strategies can achieve.

As part of this coordinated action, ASIC issued warning letters to 18 suspected unlawful finfluencers and ran a consumer awareness campaign online.

**ASIC Commissioner Alan Kirkland said,**

*'Regulators across the world have joined forces to disrupt unlawful finfluencer activity. It's important that consumers separate fun from fact when it comes to finfluencer content. Popularity doesn't equal credibility. Check their credentials and whether they're licensed or authorised, before checking your money out.'*

See [News article](#): 'ASIC cracks down on unlawful finfluencers in global push against misconduct'.

**Investment management**

The investment management sector includes responsible entities, wholesale trustees, operators of notified foreign passport funds, custodians, investor-directed portfolio service operators, managed discretionary account providers, traditional trustee company service providers, corporate collective investment vehicles and crowd-sourced funding intermediaries. In 2024–25, we undertook a program of work reviewing the compliance plans of managed investment schemes, with a focus on three sets of obligations: the design and distribution obligation (DDO), internal

dispute resolution (IDR) and reportable situations (RS) regimes.

We also undertook surveillance action on how investor directed portfolio services (platforms) are complying with DDO rules. This included a review of whether platforms take reasonable steps that will, or likely will, result in the distribution of underlying products being consistent with their target market determinations. Where we identified deficiencies, we sought process and compliance improvements to better protect investors.

**CASE STUDY 21:****Surveillance of managed investment scheme compliance plans**

ASIC reviewed the compliance plans of 50 responsible entities, representing 14.5% of all responsible entities. Combined, they operate 45% of all funds registered with ASIC and hold 47% of the value of all registered fund sector assets of approximately \$2 trillion.

The review identified widespread poor practice in the preparation of compliance plans.

ASIC published a media release and news centre article calling on responsible entities to swiftly address inadequacies and gaps in their compliance plans, including by taking account of the key findings in ASIC's review

and considering examples of better practices employed by some responsible entities.

Following the surveillance, ASIC undertook further regulatory work, including writing to responsible entities about our expectations for the review and modification of their plans.

See [Media release 25-0904MR](#) 'ASIC uncovers widespread compliance plan deficiencies in the managed investment industry', 2 June 2025.

See [News article](#) 'Review of managed fund compliance plans: 'Failing to plan is planning to fail.'

**Market infrastructure**

The market infrastructure sector includes Australian financial market infrastructure licensees, various types of market operators, benchmark administrators, clearing and settlement facility operators, derivative trade repository operators and credit rating agencies.

In July 2024, we published our findings that Australia's equity markets continue to operate with a high level of integrity and consistently remain among the cleanest in the world (see [Report 786](#) *Equity market cleanliness snapshot report*).

In February 2025, we released a discussion paper on the opportunities and risks emerging from shifts in public and private capital markets. This work highlighted the decline in public listings, rapid growth in private markets and the growing significance of superannuation.

See [Spotlight 4](#).

We also took strong action against the ASX, signalling our commitment to maintaining the integrity and efficacy of Australia's equity markets.

See [Spotlight 5](#).

For more detail, see [Strategic Priority 5](#).

## Market participation and conduct

ASIC promotes trust and confidence in markets through our surveillance of trading on Australia's securities, futures and over-the-counter (OTC) markets, and our supervision of market participants, investment banks, securities dealers and issuers of OTC products. In 2024–25, our focus areas included:

- ◆ actions to promote fair and orderly financial markets, such as risk-based surveillance of market conduct, transaction reviews actively targeting leaks of confidential information, and establishing a specialist insider trading team to expedite insider trading investigations and increase the number of criminal briefs we refer to the Commonwealth Director of Public Prosecutions
- ◆ proactive supervision and enforcement of governance, transparency and disclosure standards
- ◆ initiatives to enhance cyber, technology and operational resilience, including supporting retail stockbrokers to strengthen their controls for preventing and detecting share sale fraud
- ◆ promoting the development of international standards and better practices through participation in International Organization of Securities Commissions working groups and liaising with other local and international regulators.

For more detail, see [Strategic Priority 5](#), [Spotlight 3](#), [Spotlight 6](#) and [Spotlight 8](#).

## Corporations

Corporate transactions, including IPOs, secondary raisings, and merger and acquisition activity are all indicators of healthy capital markets and a strong level of market integrity. ASIC's work in monitoring and acting where concerns are identified enhances the ability of all Australians to confidently participate in financial markets.

We continued to intervene in control transactions, seeking structural and disclosure changes to prevent harm occurring to shareholders and the market. In 2024–25, ASIC received 50 schemes of arrangement and 37 takeover bids with an implied value of more than \$71 billion.

We also received more than 490 original prospectuses that were collectively seeking to raise more than \$8 billion. In addition, ASIC continued to review fundraising documents to enable informed investor participation, including assessing compliance with design and distribution obligations.

Our work in this area aims to ensure that corporate control transactions in Australia continue to be carried out in an informed, fair and competitive manner. This is pivotal to the integrity of our financial markets, supporting Australia's status as a sound place to invest.

In 2024–25, we continued to supervise the corporate sector, including engaging with companies and industry associations about compliance with governance and corporate law requirements, monitoring corporate governance conduct and disclosure practices, reviewing disclosures on related party transactions, and considering associated applications for relief.

We also reviewed our guidance for companies and registered schemes looking to hold virtual-only company meetings. In March 2025, we updated our webpage addressing some frequently asked questions from companies and registered schemes on holding virtual meetings, following the Australian Government's response to a review into virtual meetings provisions.

Our enforcement work focused on progressing civil penalty proceedings against entities for contraventions of directors' duties, including in our case against Star Entertainment Group for alleged failure to adequately oversee and manage risks including contraventions of anti-money laundering laws. We also referred a number of matters to the Commonwealth

Director of Public Prosecutions, including one matter involving family violence where the perpetrator appointed his former partner as a director of companies without her knowledge, misused the corporate structure, and was sentenced for making false statements to ASIC.

We also took enforcement action on conduct we were concerned undermined confidence in quality of independent expert reports (see Case study 22).

We continued to take action on compliance with design and distribution obligations, including issuing our first interim stop order in relation to a crowdsourced funding offer (see [Case study 23](#)).

#### CASE STUDY 22:

### Upholding the quality of independent expert reports

Investors rely on independent expert reports when making decisions on approving or rejecting corporate transactions, including, for example, takeover bids, corporate schemes of arrangement, corporate restructures and related party transactions.

In 2024–25, we took action over concerns with the competence of AP Lloyds Pty Ltd to provide independent expert advice and the adequacy of the supervisory arrangements of its authorised representative Advisory Partner Connect Pty Ltd, as part of its general obligations as an Australian financial services licensee.

ASIC was concerned that various independent expert reports prepared by Advisory Partner Connect did not comply with policy guidance

in [Regulatory Guide 111](#) Content of expert reports (including the suitable selection, application, and accurate disclosure of valuation approach, methodology and inputs, and transaction opinion), or policy guidance in [Regulatory Guide 112](#) Independence of experts, in respect to the engagement of technical specialists and review of their reports.

Following our investigation, ASIC accepted a voluntary variation of the AFS licence of AP Lloyds Pty Ltd, excluding the firm and Advisory Partner Connect Pty Ltd from providing advice as an independent expert.

See [Media release 24-189MR](#) 'AFS licensee to cease providing independent expert reports on corporate transactions', 28 August 2024.

**CASE STUDY 23:****ASIC's first use of stop order powers in relation to a crowd-sourced funding offer**

In 2024–25, we issued an interim stop order preventing Hirehood Pty Ltd (Hirehood) from offering securities under its crowd-sourced funding (CSF) offer document published on the VentureCrowd Pty Ltd intermediary platform. This was ASIC's first use of its stop order powers in relation to a CSF offer.

We took action in relation to Hirehood's use of a nominee arrangement, which did not permit investors to directly acquire ordinary shares in Hirehood. Instead, shares issued by Hirehood were intended to be held by a related party of the intermediary, as nominee on bare trust for the shareholders.

Under the current CSF regime, only fully paid ordinary shares can be offered.

We also took action as the offer document did not comply with certain minimum content requirements prescribed in the Corporations Act and *Corporations Regulations 2001*.

See [Media release 24-125MR](#) 'ASIC issues first crowd-sourced funding regime stop order', 13 June 2024.

**Registered liquidators**

ASIC regulates 658 registered liquidators who were appointed external administrators to more than 14,700 failed companies during the year. On our website, ASIC publishes important insolvency data collected in forms lodged with us. Registered liquidators are integral gatekeepers who play a critical role in the conduct of external administration of failed companies, protecting and realising company assets in the interests of creditors, and upholding corporate accountability by identifying and reporting corporate misconduct to ASIC.

Our work in 2024–25 focused on:

- ◆ thematic surveillance to improve compliance and inform regulatory guidance
- ◆ improving data available to the public through our insolvency statistics

- ◆ engaging with a range of domestic and international stakeholders
- ◆ appointing 58 registered liquidators to a new Abandoned Company Panel.

Registered liquidators play an important role in providing ASIC with information about the potential misconduct of companies they are appointed to. This information is an important input into our compliance and enforcement work.

During 2024–25, we reviewed how we use the information received from registered liquidators. We also reviewed how we interact with industry and, importantly, how we might work more closely with them to address director misconduct related to corporate insolvency (see [Case study 24](#)).

**CASE STUDY 24:****Improving how we use intelligence from registered liquidators**

ASIC's review of how we use the information received from registered liquidators included workshops with a selection of professional bodies, academics and registered liquidators. These workshops focused on an initial set of ideas to improve how we receive, assess and, where appropriate, act on intelligence we receive from registered liquidators.

As a result of this program of work, we have:

- ◆ provided a new way for registered liquidators to communicate with us about potential misconduct
- ◆ published updates to [Regulatory Guide 16](#) *External administrators and controllers: Reporting of possible offences and misconduct*
- ◆ published a new user guide to assist registered liquidators to complete the Initial Statutory Report form notifying us of misconduct
- ◆ made changes to our process so that we cease issuing automatic requests for Supplementary Statutory Reports, instead relying more on the professional judgement of liquidators
- ◆ made changes to simplify the Initial Statutory Report form.

We published several guidelines and publications to assist registered liquidators to comply with requirements:

- ◆ [Regulatory Guide 258](#) *Registered liquidators: Registration, disciplinary actions and insurance requirements*
- ◆ [Regulatory Guide 217](#) *Duty to prevent insolvent trading: Guide for directors*
- ◆ a new user guide for Form 5602 Annual Administration Return –see [User Guide: Preparing Form 5602](#)
- ◆ a new [Eligible Applicant information sheet](#) explaining the process for individuals or entities who want to be authorised as eligible applicants.

We also updated our Assetless Administration grant opportunity guidelines and template agreements.

This year, we published [Report 810](#) *Review of small business restructuring process: 2022–24*. The report showed a significant uptake over the past few years of the small business restructurings process, which commenced in 2021 for eligible small businesses. The report suggests the regime is playing an important role in assisting struggling small businesses to survive.

ASIC monitors liquidator conduct closely as failures or misconduct by registered liquidators can result in significant harm to companies and their creditors and erosion of trust in the Australian insolvency system.



During 2024–25, ASIC commenced three formal investigations and 26 reactive surveillances concerning the conduct of registered liquidators. Of those matters, there were four compliance outcomes, one was referred for winding up, 12 concluded with no further action, and the remaining 12 are ongoing.

ASIC continued to take enforcement action regarding serious misconduct, including referring a criminal brief to the Commonwealth Director of Public Prosecutions against a registered liquidator alleged to have misappropriated funds belonging to companies under external administration.

### Financial and sustainability reporting and audit

Investors and other stakeholders in our financial system rely on quality financial information, and auditors play an important role in maintaining trust and confidence in that financial information. Financial reporting and auditors play critical roles in giving investors and other users of financial statements confidence that they have a clear view of a company's financial position to make informed decisions.

In October 2024 we published [Report 799](#) *ASIC's oversight of financial reporting and audit 2023–24*, which summarised findings from our financial reporting and audit surveillances and other complementary work. It also highlighted areas where the quality of financial reporting and audits can be improved and led to adjustments to the financial reports totalling \$1.886 billion.

In 2024–25, we proactively reviewed a selection of financial reports and audits of listed entities and other public interest entities – such as large proprietary companies – that were previously exempt from lodging. For the first time, our surveillance program included financial reports and audits of Registrable Superannuation Entities who were required to lodge these reports with ASIC in 2024–25.

When we published Report 799, we also put auditors and audit firm CEOs on notice that we would be conducting surveillance focusing on auditors' compliance with independence and conflict of interest obligations under the Corporations Act. In 2024–25, we undertook proactive surveillance using a range of internal and public data sources to identify potential noncompliance with independence and conflict obligations. We also encouraged auditors to self-report noncompliance.

Auditors are important gatekeepers in the financial reporting system, and we take enforcement action where they have failed to meet the standards required of them. Our enforcement action includes referring auditors to the Companies Auditors Disciplinary Board (CADB), cancelling registrations and requiring remediation undertakings.

The following are two examples:

- ◆ Following an ASIC application to the CADB in relation to failures by an audit partner from Nexia Sydney Audit, Mr Santangelo, to properly carry out the duties of an auditor, the CADB issued an order suspending Mr Santangelo, and ordered him to provide various undertakings to ASIC, and to pay ASIC's costs. Combined with the auditor's earlier undertaking not to practise while the CADB made its decision, this effectively removed the auditor from practising for two years (see Case study 25).
- ◆ ASIC accepted a court-enforceable undertaking from a registered company auditor and a firm who admitted to breaching independence requirements, resulting in that auditor cancelling his registration and the firm entering into a remedial action plan.

#### CASE STUDY 25:

##### Duties of an auditor

In June 2023, ASIC commenced an application to the CADB in relation to audits carried out by Mr Santangelo for Nexia Sydney Audit. The audits related to the financial statements of the Greensill Group for the years ended December 2018 (FY18) and December 2019 (FY19).

The Greensill Group comprised over 40 entities, including Greensill Capital Pty Ltd and its subsidiaries. Mr Santangelo, as lead auditor and engagement partner of the Greensill Group's consolidated financial statements, was required to ensure that the group audits of the FY18 and FY19 financial statements were conducted in accordance with Australian Auditing Standards.

On 9 December 2024, the CADB found that Mr Santangelo failed to carry out or perform adequately and properly the duties of an

auditor in conducting the audits. The CADB made orders:

- ◆ suspending Mr Santangelo's registration as a registered company auditor until 1 June 2026
- ◆ requiring him to undertake to ASIC to complete additional continuing professional development and imposing additional peer and technical review requirements for future audits once he resumed practice, with ASIC monitoring Mr Santangelo's compliance with those undertakings
- ◆ requiring him to pay ASIC's costs, fixed at \$375,000.

See [Media release 24-277MR](#) 'Lead auditor of Greensill Group suspended by Companies Auditors Disciplinary Board until June 2026', 13 December 2024.

ASIC supports mandatory climate-related financial disclosures in accordance with legislation enacted in late 2024. Throughout this financial year, we have worked to guide and support entities on their implementation. This included publishing a regulatory guide

on sustainability reporting. We also continue to engage domestically and internationally on climate-related regulation.

For more details, see climate-related disclosure under [Strategic Priority 2](#), and [Case study 7](#).

# Operational capabilities

This financial year, we focused on three operational capabilities to improve our effectiveness and efficiency as a regulator:

- ◆ digital technology and data
- ◆ staff culture, capabilities and capacity
- ◆ stabilising and uplifting business registers.

## Digital technology and data

In 2024–25, we continued to deliver on our multi-year strategy to strengthen our digital and technology capabilities, working towards our aim to be a leading, digitally enabled and data-informed regulator by 2030, supported by and dependent on the funding and investment available to us.

Our key strategic focus areas for 2024–25 included securing our digital assets, delivering on government commitments and continuing to build our capability.

### Using technology to detect harm earlier, while maintaining appropriate governance

We continue to catalogue and describe our data assets so that the data we hold is standardised and managed effectively, thereby increasing the utility and security of our data, and trust that it is fit for purpose.

We also continued to strengthen our operational capabilities to collect, store, process and use data through:

- ◆ increasing availability of and ability to combine key and critical data for earlier detection of harms and to support decision making for our regulatory business
- ◆ developing and operationalising our Data Literacy Program and AI education series in support of ASIC's priority to become a digitally and data enabled regulator
- ◆ leveraging auditor data that we collect to develop more efficient ways of identifying trends and risk-based alerts to improve our way of working.

In 2024–25, we expanded our ability to work more efficiently with complex and large-scale datasets, and to communicate insights more clearly to decision-makers, including by:

- ◆ exploring how we can use multiple datasets (internal and external) to inform responses to regulatory issues (e.g. identifying earlier indicators or red flags for scams or companies entering into financial distress) and respond more quickly and proactively to consumer harms

- ◆ piloting the use of machine learning and AI to increase our capability and efficiency in reviewing and analysing large numbers of documents, and to more effectively categorise, prioritise and triage reports of misconduct.

### Using visualisation and business intelligence tools to identify insights and trends

In 2024–25, we expanded our use of visualisation and business intelligence tools across a range of functions, including reporting, analysis and decision support. We made greater use of tools to support statistical analysis and develop tailored visual outputs to support faster and more informed decision-making. Key examples included:

- ◆ developing interactive economic dashboards that are easily accessible and provide timely information across the organisation
- ◆ embedding visualisation tools into our analytical projects, enabling more efficient collaboration between teams and reducing manual processes
- ◆ using these tools to combine and explore large datasets across different sources, improving our ability to identify connections and emerging trends

### Making it easier to interact with ASIC

We are enhancing external interactions with ASIC by improving our corporate website, refining content, reducing duplication, and organising information based on user groups. Also, as we migrate and implement new regulatory services on our portals, we are adopting a design-led approach to engage with users. Notable examples include the new version of [asic.gov.au](https://asic.gov.au), the enhanced search function across professional

registers, and new transactions on our portal that leverage stronger security, prefill functions, and a unified interaction platform.

In doing so, we:

- ◆ completed the migration of the Professional Register search service to newer technology, using a user-centred design approach to improve customer experience
- ◆ implemented significant improvements to our corporate website, including a modern, user-centred design, a new experience for journalists and the media, and optimised businesses and companies content, making it easier for stakeholders to access company-related information
- ◆ launched functionality to support initiatives to address scams, including the takedown of websites
- ◆ updated our systems to reflect changes in the law, including in relation to the Compensation Scheme of Last Resort, climate-related financial disclosure, registrable superannuation entities and fees for takeover
- ◆ improved the experience for new and existing Australian Financial Services Licence holders when applying or changing licence details, replacing old, separate portal technology
- ◆ strengthened cyber security by introducing multifactor authentication for regulatory portal users
- ◆ continued to uplift cyber maturity through our cyber resilience transformation program, protecting ASIC's environment through reduction of technical debt and uplifting our Essential Eight cyberthreat mitigation strategy maturity

- ◆ published ASIC's AI transparency statement and public use statement, underlining ASIC's commitment to safe, trustworthy AI innovation
- ◆ implemented ASIC's AI Assurance Framework, AI Board and sandbox for experimentation, so that ASIC can combine innovation with AI use that meets community expectations and is safe, ethical and aligned with ASIC's values.

For more on how we're increasing the stability, security and reliability of our registry technology in particular, see [Business registers](#) later in this section.

### Staff culture, capabilities and capacity

We continue to focus on building a positive environment, enabling technology and empowering our employees to make confident decisions, achieve ambitious regulatory outcomes and feel valued as individuals.

#### Creating an environment for success

We are developing a more constructive culture through targeted action, and have seen an uplift in employee engagement of four percentage points between September 2024 and March 2025.

We have focused on enabling effective leadership, with 41 Senior Executive Leaders undertaking a leadership development program. Building on this development program, we have also invested in our Senior Manager and Executive Leader/Specialist population with the launch of a bespoke Leadership Development program for 262 leaders across ASIC.

We also reviewed our Existing Leaders program, replacing it with 'ASIC Edge', a future-facing, aspirational leadership development program aligned to our culture goals.

ASIC participated in the APS Employee Census for the first time since 2019, with a 71% participation rate. This survey enables us to benchmark engagement against similar-sized agencies, and is designed for more detailed action planning.

Investment in technology that supports our people is essential for delivering against our people strategy. For example, the first phase of our new payroll system has been implemented this year, enabling the transfer of the registry operations team from the Australian Taxation Office to ASIC. More information on this can be found under [People systems and technology](#) in Chapter 5.

#### Reconciliation Action Plan focus areas

As we move towards the end of our current Reconciliation Action Plan (RAP) period in January 2026, we continue to build the infrastructure that maximises our current outcomes while considering future progress to the next RAP. In doing so, we have identified a way to improve our RAP development process: introducing a co-chair dynamic.

In the spirit of reconciliation, one chair will be an Indigenous staff member and one a non-Indigenous staff member. Leaning on our learnings about cultural safety, we seek to lessen cultural load on ASIC's Aboriginal and Torres Strait Islander employees with this change.

Indigenous recruitment and cultural safety learning engagement continue to be a priority, so we look forward to finalising our program in the current RAP period and considering how we can improve outcomes into the next.

### Uplifting accessibility and belonging

We continue to build our Diversity, Inclusion and Belonging strategy through our commitment to developing an understanding and appreciation of the lived experiences of our employees and the wider community. For more on this strategy, see [Diversity, inclusion and belonging](#) in Chapter 5.

This year, we published our Accessibility Action Plan 2024–26 and delivered ASIC-wide workshops, including Respect at Work, Recruiting for Diverse Perspectives, Understanding Domestic and Family Violence, and Aboriginal and Torres Strait Islander Cultural Safety.

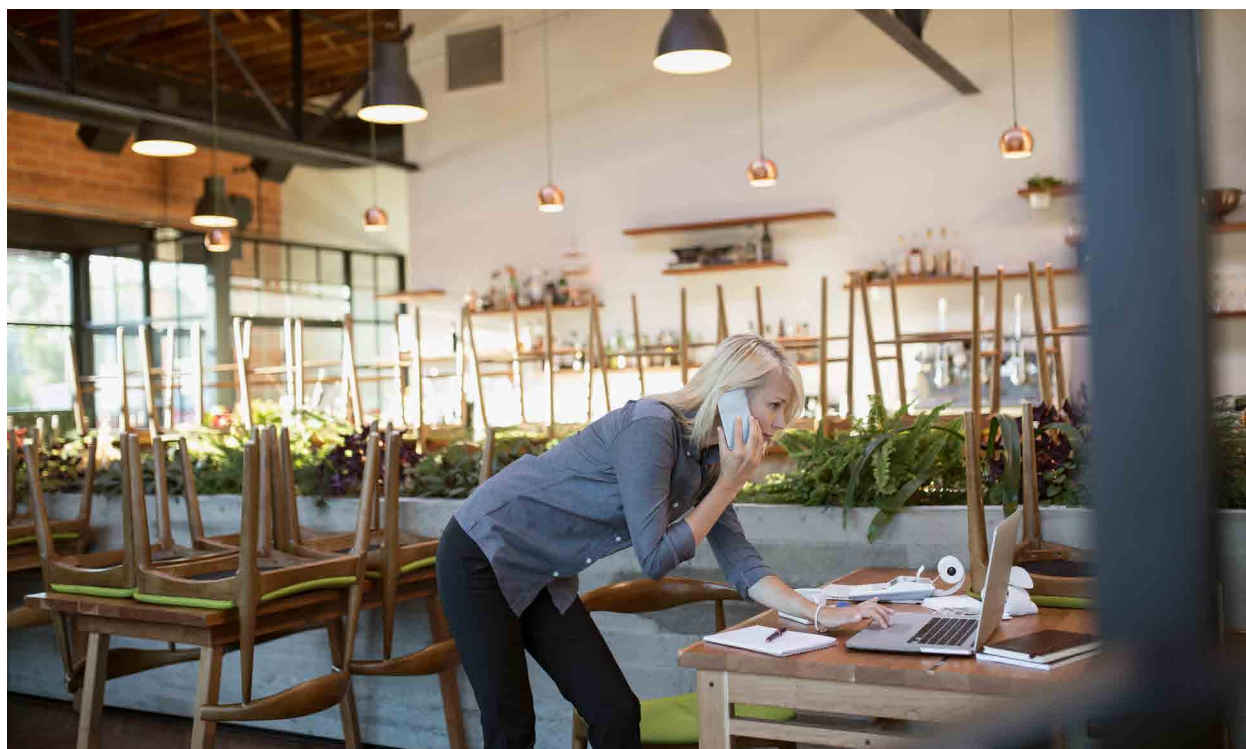
We continued to acknowledge and facilitate key dates of significance, such as International Women’s Day, National Reconciliation Week and International Day of Persons with Disabilities.

### Supporting our people with Respect@Work

Our people are our most important asset, so their health, safety and wellbeing is our top priority. This year, we have supported our people leaders by helping them understand their obligations following legislative changes to the Sex Discrimination Act 1984, with 337 leaders to date completing Respect@Work training.

In addition, this year there were no notifiable incidents reportable to Comcare.

For more on how we empower, mentor, lead and prioritise the health, safety and wellbeing of our staff, see [Chapter 5](#).





## Stabilising and uplifting the business registers

Below are some of the key improvements to our business registers that we have made this financial year.

### Responding more quickly to phone queries

We have improved call centre efficiency by expanding our team of customer service officers and investing in new technology. As a result, the average time to answer calls improved to under 12 minutes as at June 2025, a 52.87% reduction of time in the queue compared to the year's average.

### New Professional Registers Search

The new ASIC Professional Registers Search has replaced the legacy ASIC Connect service, offering a modernised and more stable platform for accessing professional register data. The new search features a refreshed and modern interface and includes advanced search functionality across multiple registers, with filters such as location-based criteria and streamlined access to documents and extracts. The new search also incorporates a secure and simple payment process.

## More reliable access to company searches

We have significantly improved access to our high-volume company search services, particularly on weekends. Between January and June 2025, scheduled downtime for planned maintenance on Saturdays was reduced to 28 hours, compared to 104 hours over the same period in 2024. This represents a 73% improvement, resulting in more reliable access to ASIC's registry data, more often.

These improvements benefit information brokers, credit bureaus and other high-volume data consumers who use ASIC's registry data to support activities such as credit checks, legal compliance and business verification.

### Upgrade to support IT infrastructure

ASIC's Mainframe is the core infrastructure that supports our online registry services and business registers. In September 2024, it was upgraded to run more efficiently, reducing processing usage by 40%. This is helping ASIC's technology systems stay more reliable.



# Principles of regulator best practice

The government expects regulators to strive for continuous improvement in relation to the three principles of regulator best practice, and to report progress in their annual report. Examples of how ASIC has delivered against these principles are described throughout this report, with key highlights provided below.

## 1. Continuous improvement and building trust:

regulators are required to adopt a whole-of-system perspective, continuously improving their performance, capability and culture to build trust and confidence in Australia's regulatory settings.

ASIC has committed to continuous improvement in processes, governance and capabilities including:

- a self-initiated review of how we undertake effective planning, monitoring and reporting to evaluate our progress towards achieving our regulatory outcomes. We have developed a staged approach to improvement (see [page 24](#))
- implementing our cross-agency triage process to assess and consider matters quickly, with a focus on investing ASIC's compliance and enforcement resources into achieving meaningful outcomes that have impact (see [page 69](#))

- improving the experiences of new and existing Australian Financial Services Licence holders when applying or changing licence details (see [page 110](#))
- continuing to sponsor, guide, develop and deliver capability-building activities by working in partnership with our Professional and Technical Learning Advisory Panels and Networks (see [page 127](#)).

## 2. Risk-based and data-driven: regulators manage risks proportionately and maintain essential safeguards while minimising regulatory burden, and leveraging data and digital technology to support those they regulate to comply and grow.

ASIC has weighed the cost-effectiveness and efficiency of its regulatory actions, seeking to impose the least burden on our regulated population while maintaining essential safeguards through:

- prioritising resources to the areas of highest risk, through our annual risks and opportunities, and our process for setting strategic priorities (see [page 17](#))
- building staff and organisational data capability and digital literacy (see [page 109](#))

- using multiple datasets to inform decisions on how to respond to regulatory issues and combining insights across multiple datasets to enhance ASIC's ability to respond more quickly and proactively to consumer harms (see [page 109](#))
- developing the enhanced regulatory sandbox, which allows ASIC to facilitate innovation while ensuring consumer and investor protection (see [page 86](#)).
- engaged regularly with current and prospective small business owners, other government agencies, industry associations and small business advisory and counselling services to exchange insights, address challenges and promote compliance within our remit (see [Engagement](#))
- established the ASIC Simplification Consultative Group comprising expert consumer, business and industry leaders (see [Spotlight 7](#)).

### 3. Collaboration and engagement:

regulators are transparent and responsive communicators, implementing regulations in a modern and collaborative way.

ASIC has engaged genuinely and regularly with stakeholders, including regulated entities, other regulators and the community. In particular it has:

- engaged with various departments, including the Department of Finance and Treasury, on the development of ASIC's new performance measures
- hosted the ASIC Symposium: Australia's Public and Private Markets to discuss the future of Australia's markets (see [Spotlight 4](#)).