



14 April 2022

Stephanie Rickard, Senior Manager
Investment Managers
Australian Securities and Investments Commission
GPO Box 9827
Brisbane QLD 4001

By email: CCIVconsultation@asic.gov.au

Dear Stephanie,

Cboe Australia (**Cboe**) welcomes the opportunity to make submissions on ASIC Consultation Paper 360 *Corporate collective investment vehicles: Preparing for the commencement of the new regime (CP 360)*.

Cboe is supportive of the legislated CCIV framework. We are hopeful that it will increase the competitiveness of Australia's managed funds industry, allow the offering of internationally recognisable investment products, and promote global regulatory alignment.

We do not have specific feedback in relation to ASIC's individual proposals in CP 360. Instead, we wish to put on record our overall support for the aim of the positions ASIC has proposed, which is to ensure appropriate licensing standards for corporate directors that seek to operate CCIVs and advisors that seek to provide advice in respect of CCIVs. We consider appropriate licensing standards will be critical in ensuring that investors and the market can have confidence in CCIVs.

As a strong supporter of competition in financial markets, we also submit that ASIC should, to the extent it is not already doing so, take into account the following in its approach to CCIVs:

- Encouraging offshore providers to come to Australia
- Ensuring competitive neutrality between CCIVs and managed investment schemes
- Promoting Australia as a place to do business
- Benchmarking Australia against global centres for funds management

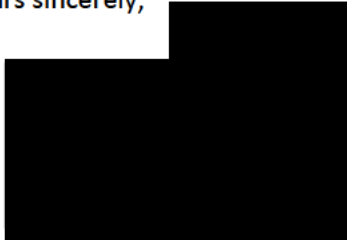
As a licensed market operator with a strong track record of supporting innovation, Cboe would welcome the quotation of CCIV sub-funds on its investment products market. We are in the process of benchmarking our rules and identifying what operating rule changes we would need to make to enable this.

As a potential supervisor of CCIV sub-funds, should they become quoted on our market, we would welcome regular dialogue with ASIC on CCIVs, so we can stay informed on important developments and share approaches on appropriate supervision and monitoring frameworks in due course.



If you have any questions, please contact me using the details below.

Yours sincerely,



Asika Wickramasinghe | Senior Legal Counsel
Cboe Australia Pty Ltd

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