



AQUA Product Name Change Procedures

8 April 2024 | Version 1

Introduction

The purpose of this document is to assist AQUA Product Issuers ('Issuers') and their investment managers to understand ASX's procedures to change an AQUA Product's name following the introduction of Rule 10A.5.1(a) and 10A.5.3(a) and its related Procedure which facilitates the implementation of ASIC's product labelling and 'true-to-label' naming considerations outlined in ASIC Information Sheet 230.

ETFs and Exchange Traded Managed Funds (ETMFs) that have been admitted to Trading Status on or before 15 April 2024 will have a 12-month transition period, starting on 15 April 2024 to make any necessary changes to migrate to the new naming requirements. The transition period will end on 15 April 2025, meaning all AQUA Products must comply with the new naming requirements by close of business 15 April 2025. A failure to do so by this time will be a breach of Rules 10A.5.1(a) and 10A.5.3(a) (as applicable) and will result in a suspension of trading in the securities of the AQUA Product until the requirement is satisfied.

The main points in this procedure include:

1. The information ASX requires
2. Summary of new requirements
3. How ASX will respond to a name change notification
4. What ASX requires an Issuer to do to effect the name change
5. Timing

The information ASX requires

During the transition period, each Issuer must make a submission to ASX about how its AQUA Products will be named under the new rules. Submissions should be emailed to Investment Products Compliance at InvestmentProducts.Compliance@asx.com.au.

ASX will assess each proposed name change to ensure the new name satisfies the requirements of Rule 10A.5.1(a) and 10A.5.3(a) (as applicable) and its related Procedure.

ASX requests that an Issuer sets out the proposed name changes for all of its AQUA Products in one submission, as well as confirmation of any AQUA Products that will not have their name changed. Please include the following information:

- Issuer Name
- AQUA Product ASX code
- Current registered and ASX AQUA Product Name
- Proposed new registered and ASX AQUA Product Name (if applicable)
- Confirmation whether member approval is required to change the name (if applicable)
- Proposed effective date (if applicable)

In providing the above, please ensure that any proposed new name follows the new ASIC naming requirements as set out in Guidance Note 17 and ASX's system character limitations. Please note ASX may truncate the AQUA Product name for system purposes, and that character limitations include spaces.

A template can be uploaded from the [ASX Compliance downloads](#) page to assist Issuers seeking to change the name of multiple AQUA Products.

Summary of new requirements

Guidance Note 17 outlines how the new naming requirements will be applied. A summary is provided below.

Naming Convention and labelling

- The Primary label of an AQUA Product will either be ETF or Structured Product.
- The Secondary label (where applicable) will be Active or Complex.
- The Primary label must follow the Secondary label.

(i) All Primary and Secondary labels are to appear at the end of the product name

The Primary and, if applicable, Secondary labels are to appear at the end of each ETP name in the format:

- [FUND NAME] [SECONDARY LABEL] [PRIMARY LABEL]

(ii) No adulteration of the Primary and/or Secondary labels

No words, punctuation marks or other typographic notes are to appear between or with the Primary and/or Secondary labels, e.g.:

- ABC Active ETF, XYZ ETF, DEF Structured Product **are acceptable**,
- ABC Active – ETF, XYZ E.T.F., DEF Structured *Product* **are not acceptable**

Use of typographic markings

(i) Use of brackets

Brackets are not to be used to encapsulate any of the Primary or Secondary labels required by ASIC Information Sheet 230, e.g.:

- *ABC Active ETF* **is acceptable**,
- *ABC (Active ETF)* **is not acceptable**

Brackets can be used for other purposes provided these appear before the Primary or Secondary labels, e.g.:

- *ABC (Currency Hedged) ETF* **is acceptable**,
- *ABC ETF (Currency Hedged)* **is not acceptable**

(ii) Use of dashes

Dashes may be used prior to the Primary or Secondary labels where the Issuer considers this to be appropriate, e.g.:

- *ABC Fund – Active ETF, or XYZ – Complex ETF* **is acceptable**

Dashes must not be used in between the Primary and Secondary labels, e.g.:

- *ABC Fund Active – ETF* **is not acceptable**

ASX security descriptions

Issuers are welcome to suggest ASX security descriptions (e.g. ASX Long Names¹, ASX Abbreviated² and ASX Short Name³), subject to ASX approval and character limitations. ASX security descriptions are used for operational set-up and will be included in the ASX ReferencePoint which will be consumed by data vendors and brokers. Illustrative examples are provided below.

| AQUA PRODUCT (ASX: XXXX) | EXISTING DETAILS | NEW DETAILS |
|--|------------------------|-----------------------------------|
| REGISTERED AQUA PRODUCT NAME | AUSTRALIAN ASX200 FUND | AUSTRALIAN ASX200 FUND ETF |
| ASX FULL NAME/LONG DESCRIPTION (MAX 50 CHARACTERS) | AUSTRALIAN ASX200 FUND | AUSTRALIAN ASX200 FUND ETF |
| ASX ABBREVIATED NAME (MAX 20 CHARACTERS) | AUS ASX200 FUND | AUS ASX200 ETF |
| ASX SHORT NAME (MAX 9 CHARACTERS) | AUS200 | AUS200ETF |

How ASX will respond to a name change notification

ASX will provide the Issuer with a letter of no objection to an AQUA Product's name change for the purposes of Rule 10A.5.1(a) and 10A.5.3(a) (as applicable). The letter will also provide the Issuer with any updated conditions of admission (if required), and any conditions of admission relating to the existing name or label will cease to apply once the new name is implemented.

What ASX requires an Issuer to do to effect the name change

ASX expects that when implementing the new naming convention in respect of an AQUA Product, Issuers will lodge an ASX market announcement via the market announcements platform advising of the new AQUA Product's name together with a short summary explaining the name change. The announcement should be lodged together with an updated disclosure document.

ASX will then facilitate the name change in ASX's systems using the information provided above.

Timing

Before an Issuer submits a formal request to change the name of an AQUA Product, ASX recommends that the Issuer first discuss the changes with Investment Products Compliance at the earliest opportunity. Investment Products Compliance will be able to provide general advice on the proposed new name and the likely timeframe for a confirmation of no objection and any likely conditions (if any).

Please allow Investment Products Compliance at least 2 weeks to formally assess whether the new AQUA Product's name is 'true-to-label' and complies with the new naming requirements.

Issuers providing a submission about a naming proposal that is not straight forward (as contemplated in Section 3 of Guidance Note 17) should expect a longer timeframe.

Name changes in ASX systems will be updated within 2 business days of the implementation of the name change.

¹ The 50 character name will need to include the ETF's primary label, and where applicable, the secondary label

² The 20 character name does not need to include the ETF's primary label, or where applicable, the secondary label.

³ The 9 character name does not need to include the ETF's primary label, or where applicable, the secondary label.



Further enquiries:

Investment Products Compliance

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