

# Listed@ASX Compliance Update no. 12/25

31 October 2025

## 1. Consultation paper on a consequential amendment to Listing Rule 17.5 following the introduction of mandatory sustainability reporting

Listing Rule 17.5 provides that trading in a listed entity's securities will be suspended if the entity fails to lodge the annual reporting documents required under Listing Rule 4.5 by the due date.

The Corporations Act was recently amended to require some entities to prepare annual sustainability reports.<sup>1</sup> This amendment to the Corporations Act has the flow on effect that the scope of Listing Rule 17.5 is expanded to require suspension of the securities of listed entities that lodge their sustainability report after the due date (to the extent that they are required to prepare those reports under the new Corporations Act requirements).

ASX has released a consultation paper on a proposed change to Listing Rule 17.5 which will have the effect that the late lodgement of an annual sustainability report will not result in mandatory suspension.

This is intended to preserve the current status quo so that trading in an entity's securities will only be mandatorily suspended under Listing Rule 17.5 if an entity fails to give the annual directors' report, the statutory financial report or the auditor's report to ASX by the due date.

The consultation paper can be accessed [here](#). Written submissions are requested by Friday 28 November 2025.

## 2. Interaction of new sustainability reporting requirements with existing financial reporting rules

Currently, listed entities (other than mining exploration and oil and gas exploration entities) are required to lodge their preliminary final report no later than two months after the end of their accounting period in accordance with Listing Rule 4.3B. The preliminary final report must contain the information set out in Appendix 4E.

ASX has received enquiries from listed entities and their professional advisers about the interaction of the new sustainability reporting requirements with ASX's existing rules, and, in particular, whether the Appendix 4E will require disclosure of sustainability-related information earlier than the statutory due date for lodging the sustainability report.

The Appendix 4E sets out clear requirements for the contents of preliminary final reports that are longstanding. The Appendix 4E is not intended to accelerate the disclosure of sustainability-related information that would not have been required to be disclosed under the Appendix 4E requirements in prior years.

Generally speaking, for listed entities that must prepare a sustainability report under the Corporations Act, the information in the statutory sustainability report does not need to be released any earlier than the due date for release of the annual reporting documents required under Listing Rule 4.5, unless the information is required to be disclosed earlier under Listing Rule 3.1. The documents required under Listing Rule 4.5 must be lodged no later than three months after the end of the accounting period rather than the shorter two-month period for lodgement of the Appendix 4E.

Listed entities should be aware that if they are required to prepare a sustainability report under the Corporations Act, they are required to lodge the report on the market announcements platform by the due date even if the proposed amendment to Listing Rule 17.5 noted above is made. Regardless of whether Listing Rule 17.5 requires mandatory suspension, late lodgement of the sustainability report will still result in non-compliance with Listing Rule 4.5 unless the entity has received a waiver from ASX prior to the due date for lodgement.

<sup>1</sup> Further details about the new Corporations Act requirements can be found here: <https://www.asic.gov.au/regulatory-resources/sustainability-reporting/>

Any listed entity that applies to ASIC for relief from the Corporations Act sustainability reporting requirements should also engage with ASX about a waiver, bearing in mind the normal 20 business day timeframe for processing a non-standard waiver application.

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Listed entities are reminded that they must have a nominated person responsible for communication with ASX in relation to Listing Rule matters (Listing Rule 12.6).

Entities should keep the contact details of their nominated ASX contacts up to date on ASX Online at all times and also inform their Listings Adviser of any changes. Further information about how to notify ASX of any changes (including temporary changes) made to the entity's nominated ASX contact is available [here](#) (see Item 3).

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*If you missed any of our historical Compliance Updates, or would like further resources to help understand the ASX Listing Rules, please visit our educational resources for listed entities page [here](#).*

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