Listed@ASX Compliance Update no. 13/25

19 December 2025

1. Amendment to Listing Rule 17.5

On 31 October 2025, ASX released a consultation paper titled 'Amendment to Listing Rule 17.5.'

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. 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 consulted 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 a consequential amendment which is intended to preserve the current operation of the Listing Rules following the changes to the Corporations Act.

ASX received 8 submissions from a variety of stakeholders on the consultation paper, with 7 out of the 8 submissions indicating their support for the change.

Following consideration of the submissions received as part of the consultation, ASX has determined to proceed with the amendment to Listing Rule 17.5, as set out in Annexure A of the consultation paper, with the rule becoming effective on 16 January 2026, subject to regulatory approvals.

In response to one of the submissions, ASX would like to clarify that the rule change will not permit or otherwise enable the deferral of an entity's annual sustainability reporting. Listed entities that are required to prepare an annual sustainability report must still give that report to ASX within the timeframe required by Listing Rule 4.5 (being no later than three months after the end of the accounting period). However, suspension of the entity's securities will not be an automatic consequence of late lodgement. The rule change preserves the current status quo under the Listing Rules but does not diminish the Corporations Act obligation to prepare a sustainability report.

ASX is mindful that the new legislative requirements for annual sustainability reporting will be phased in progressively over a number of years. ASX continuously monitors market developments and may adjust its policy settings and enforcement approach as market practice develops.

See Listed@ASX Compliance Update no. 12/25 for additional details about the interaction of the new sustainability reporting requirements with existing financial reporting requirements under the Listing Rules.

2. Listing Rule 7.1: Revised approach to securities issued under employee incentive schemes

A listed entity may seek securityholder approval pursuant to Listing Rule 7.2 exception 13 for the issue of equity securities under an employee incentive scheme. Securities issued in accordance with the approval do not count towards the entity's placement capacity under Listing Rule 7.1.

In order for the exception to apply, the notice of meeting containing a Listing Rule 7.2 exception 13 approval (or prospectus, PDS or information memorandum in respect of an employee incentive scheme established before the entity was listed) must contain the required details set out in the exception, including the maximum number of equity securities proposed to be issued under the employee incentive scheme.

If an entity subsequently obtains approval under Listing Rule 10.14 to issue securities to a director (or their associate) under an employee incentive scheme that has been approved under Listing Rule 7.2 exception 13, ASX's current position is that securities issued pursuant to the Listing Rule 10.14 approval also count towards the maximum limit of securities approved for the purposes of Listing Rule 7.2 exception 13.

Some entities have encountered difficulties with ASX's current approach. These difficulties have arisen because it is not obvious that securities issued with approval under Listing Rule 10.14 should be counted towards the maximum limit approved under Listing Rule 7.2 exception 13, given that securityholders have separately consented to each issue.

ASX has reviewed its current approach and decided to revise its position, having regard to the spirit, intention and purpose of the rules. Under the new approach, an issue of securities that is approved under Listing Rule 10.14 will no longer count towards the maximum number of securities that can be issued under an employee incentive scheme approved under Listing Rule 7.2 exception 13.

3. Holiday hours and closures

Normal trading will cease at 2:10pm AEDT on both Christmas Eve and New Year's Eve. The Market Announcements Office will close at 4:30pm AEDT on those days.

The market will not trade on Christmas Day, Boxing Day and New Year's Day.

4. Upcoming periodic deadlines

Listed entities are reminded of upcoming deadlines for periodic reports:

- Preliminary final reports (December year-end) – Friday 27 February 2026.
- Statutory half year financial reports (except mining exploration and oil and gas exploration entities) (June year-end) – Friday 27 February 2026.
- Statutory half year financial reports for mining exploration and oil and gas exploration entities (June year-end) – Monday 16 March 2026.
- Statutory audited annual accounts (December year-end) – Tuesday 31 March 2026.
- Annual reports (December year-end) – Thursday 30 April 2026 for listed companies and Tuesday 31 March 2026 for listed registered schemes.
- December quarterly reports for mining exploration, oil and gas exploration and commitments test entities – Friday 30 January 2026.
- An investment entity must notify the net tangible asset backing of quoted securities within 14 days of the end of each month.

Listed entities are also reminded that a failure to lodge the relevant documents on time (i.e. by close of the Market Announcements Office on the due date) will result in an automatic suspension of the entity's securities under Listing Rule 17.5.

Dual listed entities that have CDIs issued over quoted securities are also reminded that they must lodge an Appendix 4A within 5 business days of the end of each month.

5. Reporting calendar for CY26

The 2026 reporting calendar for listed entities is now available on the home page of ASX Online and on the ASX website. The reporting calendar outlines key reporting dates under the Listing Rules. It also indicates days on which ASX is closed.

If you require assistance to understand your entity's periodic reporting obligations, please contact your Listings Adviser.

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).

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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