



CHARTERED SECRETARIES  
AUSTRALIA

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18 January 2002

Ms Catherine Officer  
National Companies Counsel  
Australian Stock Exchange Limited  
**Email: [catherine.officer@asx.com.au](mailto:catherine.officer@asx.com.au)**

Dear Catherine,

**Proposed Listing Rule amendments – Financial Services Reform Act 2001**

Chartered Secretaries Australia (CSA) appreciates the opportunity to comment on the proposed amendments to the ASX Listing Rules set out in your document dated 14 December 2001.

We note that whilst the FSR Act makes substantial changes to the Corporations Act, the consequent changes to the Listing Rules are relatively insignificant. If there are any faults or complexity, we believe these arise from the FSR Act. The apparent multiplicity of definitions of “security” and “associates” adds an unwanted level of complexity. We propose to address these and the issue of confirmation requirement in discussions with the relevant executives at ASIC.

We understand that further amendments to the Listing Rules are under consideration for introduction later this year. We would be pleased to assist the Exchange in identifying any matters. To this end, we suggest a meeting between either yourself or Ms Karen Hamilton and CSA’s Legislation Review Committee would be a suitable opportunity to further such discussions. We will contact you in the very near future.

Yours sincerely,

Tim Sheehy  
CHIEF EXECUTIVE