

Dear Marisa

Please find below Third Party Platform Pty Ltd's response ASX's consultation on Capital Requirements.

1. Do you think that the current minimum core capital requirement of \$5 million for DCP is appropriate?

Yes, it is a reasonable balance between providing a level of stability and confidence in ASX and the markets and DCPs.

2. If you do not consider the \$5 million appropriate ?

N/A

3. Are there any other factors that ASXCL should take into consideration in determining the appropriate course of action with respect to minimum core capital requirements?

The current range of capital and liquidity measures in place such as Minimum Core Capital and Cash Market Margining (end of day and intra day) need to be considered as part of the overall review of the Capital requirements. These measures need to be reviewed in order to ensure that there is minimal overlap and duplication of requirements.

4. Do you think a tiered minimum core capital requirement for GCPs is appropriate

Yes as it strikes a balance in reducing barriers for entry for DCPs wishing to enter the market whilst recognising those DCPs which may have a related party. Having more GCPs in the market will aid in reducing the concentration of risk in one or a small number of GCPs clearing for a significant number of Participants. Having more GCPs could also lower costs overall.

5. If "yes" to above, is ASX's tiering proposal appropriate ? If not ,what would you propose?

The tiering is based on the number of Trading Participants that the GCP is clearing for, however it does not take into account the clearing/settlement risk associated with the Trading Participants.

6. Do you think there should be a time limit for transitional capital arrangements?

No

7. Are there any other factors that ASX clear should take into consideration in determining the appropriate course of action with respect to tiered minimum core capital requirements for GCPs?

No.

Regards

Hylton

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