The Australian Chamber of Commerce in Hong Kong

Subject: Submission to the Hong Kong Exchanges and Clearing Limited – Consultation Paper on Listing Framework Competitiveness Review

1. Executive Summary

The Australian Chamber of Commerce in Hong Kong welcomes the opportunity to respond to HKEX's Consultation Paper on the Listing Framework Competitiveness Review. We commend HKEX for undertaking this timely and important initiative, which reflects a clear commitment to ensuring Hong Kong's continued leadership as a premier international financial centre.

AustCham Hong Kong represents a diverse membership of senior business leaders, investors, professional advisers, and entrepreneurs with deep experience operating across the Australia–Hong Kong and broader Asia-Pacific corridor. Our members bring practical, cross-border perspectives on capital formation, market access, and the regulatory settings that support high-quality listings and sustainable investor confidence.

In this submission, we offer constructive observations in four key areas: the opportunity to broaden the listing framework to better accommodate mid-cap and growth-stage companies; the strategic importance of facilitating listings in high-growth sectors such as critical minerals, technology, healthcare, and venture-backed enterprises; the potential to enhance secondary listing pathways; and the value of reviewing the current SPAC framework to ensure it remains internationally competitive.

Throughout, we emphasise our strongly held view that competitiveness and investor protection are complementary objectives, and that calibrated enhancements to the listing framework can advance both simultaneously.

AustCham Hong Kong stands ready to support HKEX's ongoing review through continued dialogue, sector-specific insights from our membership, and facilitation of engagement with Australian-listed companies and market participants.

2. General Observations

Hong Kong's position as one of the world's leading listing venues is well established and well earned. The combination of robust governance standards, deep liquidity, proximity to mainland China, and a sophisticated professional services ecosystem gives Hong Kong enduring structural advantages that few markets can replicate. The Consultation Paper rightly recognises, however, that maintaining this leadership position requires continuous adaptation to a rapidly evolving global capital markets environment.

Our members observe that the competitive landscape for international listings is shifting. Companies, particularly those in high-growth and emerging sectors, now have a wider range of listing venues available to them and are making increasingly sophisticated assessments of where to raise capital. In this context, the accessibility, flexibility, and clarity of a market's listing framework are material factors in attracting high-quality issuers.

We note that this Consultation Paper represents the first phase of a broader competitiveness review, and we welcome that phased and considered approach. The proposals to diversify the types of companies

eligible for listing and to enhance investor choice are sound in principle. We encourage HKEX to ensure that subsequent phases build on this foundation with the same ambition and rigour.
Importantly, our members view competitiveness and investor protection not as competing priorities but as mutually reinforcing goals. A listing framework that attracts a broader range of quality issuers deepens market diversity, enhances price discovery, and ultimately strengthens investor outcomes. We encourage HKEX to hold this principle at the centre of its review.

3. Specific Recommendations

Broadening Access for Mid-Cap and Growth-Stage Companies
The current listing framework has served Hong Kong well in attracting large-cap primary and secondary listings. Our members' experience suggests that there is meaningful opportunity to broaden access for mid-cap and growth-stage companies that represent the next generation of globally significant enterprises. Many of these companies possess strong fundamentals, credible growth trajectories, and experienced management teams, but may not yet meet listing thresholds designed for more established issuers.

We encourage HKEX to consider calibrated adjustments to revenue requirements, track record expectations, and anchor investor constructs where appropriate, with a view to expanding the universe of high-quality IPO candidates without compromising market integrity. Such adjustments would signal to the global market that Hong Kong is not only a destination for the largest issuers but also a dynamic platform for companies at inflection points of growth.

Facilitating Earlier-Stage and Sector-Specific Listings
The global economy is being reshaped by sectors that are inherently capital-intensive in their early stages. These include critical minerals and natural resources, technology and artificial intelligence, healthcare and life sciences, and venture-backed innovation businesses. Hong Kong has already demonstrated foresight in developing frameworks such as Chapter 18C for specialist technology companies. We encourage HKEX to build on this momentum by ensuring that the listing process for earlier-stage companies in these sectors is as streamlined and accessible as possible.

Our members note that the IPO process for such companies can be perceived as cumbersome relative to competing venues, and that further simplification, while maintaining appropriate disclosure and governance safeguards, could materially increase Hong Kong's attractiveness as a listing destination for these high-growth sectors.

Enhancing Secondary Listing Pathways
We welcome the proposals in the Consultation Paper to further facilitate listings of issuers already listed on overseas exchanges. The proposed market capitalisation threshold of HK$3 billion for secondary listings is a constructive development that would comfortably encompass a substantial portion of companies listed on major international exchanges, including a wide range of ASX-listed companies.

We encourage HKEX to ensure that the secondary listing process is clear and efficient, with transparent eligibility criteria and streamlined regulatory pathways. An accessible secondary listing framework positions Hong Kong as a compelling additional capital markets venue for companies seeking to diversify their investor base and deepen their presence in Asia.

Reviewing the SPAC Framework
Special purpose acquisition companies remain an important feature of the global capital markets toolkit, and we note renewed activity in SPAC transactions in other major markets. Hong Kong's introduction of a SPAC regime was a welcome innovation. We encourage HKEX to review the current framework's competitiveness and uptake with a view to identifying calibrated adjustments that might enhance its effectiveness as a pathway to listing for high-quality target companies.

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Such a review would be consistent with the broader objectives of this consultation and would signal Hong Kong's commitment to offering a full range of modern listing mechanisms.

4. Strategic Opportunities for Hong Kong

The competitiveness review presents a significant strategic opportunity for Hong Kong to strengthen its position as the pre-eminent international listing venue in Asia, particularly for companies in sectors that are central to the global economic transition.

Australia offers a compelling illustration of this opportunity. As the world's leading producer of critical minerals essential to the energy transition, and with a strong and growing presence in technology, artificial intelligence, and healthcare, Australia is home to a large number of companies that would benefit from access to Asian capital markets and investor networks. Hong Kong, with its deep liquidity, international regulatory reputation, and geographic position, is a natural venue for these companies to access the region.

A listing framework that accommodates the specific characteristics of these sectors, including earlier-stage revenue profiles, resource-based business models, and technology-driven growth trajectories, would position Hong Kong to capture a meaningful share of cross-border capital formation that might otherwise flow to competing venues. This is not solely an Australian opportunity. Companies across the Asia-Pacific, the Middle East, and beyond share similar profiles and would be drawn to an accessible Hong Kong listing platform.

AustCham Hong Kong's membership includes senior executives, investors, and advisers with direct experience in these sectors and deep relationships across the Australia–Asia corridor. We see considerable potential for Hong Kong to become the secondary listing venue of choice for high-quality companies in critical minerals, technology, and life sciences, and we are well positioned to facilitate the dialogue and market engagement that would support this outcome.

5. Conclusion

AustCham Hong Kong commends HKEX for undertaking this important review and for inviting broad market input. The Consultation Paper reflects a clear-eyed assessment of the competitive dynamics shaping global capital markets, and the proposals put forward represent a meaningful step toward ensuring Hong Kong's listing framework remains world leading.

We encourage HKEX to pursue these reforms with ambition, guided by the principle that a more accessible, diverse, and dynamic listing platform strengthens rather than diminishes investor confidence and market quality. Calibrated simplification, broader sectoral reach, enhanced secondary listing pathways, and a competitive SPAC framework will collectively reinforce Hong Kong's position as the international financial centre of choice for the next generation of global companies.

AustCham Hong Kong welcomes the opportunity to continue contributing to this review. We are prepared to facilitate direct engagement between HKEX and Australian-listed companies and market participants, to provide sector-specific insights drawn from our membership, and to participate in any working groups, roundtables, or further consultation forums that HKEX may convene. We view this as the beginning of a deeper and ongoing dialogue, and we look forward to supporting Hong Kong's continued success as a global capital markets leader.

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