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Australia (ASIC) vs UK (FCA): forex licenses compared

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In short: Australia (ASIC): minimum capital A$1m NTA (or 10% of revenue), retail leverage 30:1, compensation none (AFCA complaints only). The United Kingdom (FCA): minimum capital £750,000 (dealing on own account), retail leverage 30:1, compensation up to £85,000 (FSCS). Figures as of November 2026.

This page sets the two regimes side by side, using the same headings for each. It does not say which is ‘better’: that depends on who the clients are and what protection they need. The full rules, sources and FAQs are in the Forex license in Australia and Forex license in the United Kingdom guides.

Side by side

	Australia	United Kingdom
Regulator	Australian Securities and Investments Commission (ASIC)	Financial Conduct Authority (FCA)
License	Australian financial services licence (AFSL) authorising the firm to issue and deal in derivatives and foreign exchange contracts	Part 4A permission as an investment firm, with permissions such as dealing in investments as principal or as agent
Legal basis	Corporations Act 2001, Chapter 7; ASIC Instrument 2022/705 (financial requirements); CFD product intervention order (Instrument 2020/986)	Financial Services and Markets Act 2000; FCA Handbook (MIFIDPRU prudential rules, COBS 22.5 CFD rules, CASS client assets rules)

	Australia	United Kingdom
Minimum capital	Net tangible assets of at least the greater of A$1,000,000 or 10% of average revenue, with at least half of the required amount in cash or cash equivalents.	Permanent minimum requirement of £75,000, £150,000 or £750,000 depending on permissions; £750,000 for a firm that deals on its own account, as a market-making CFD provider does. Own funds must also cover the fixed overheads requirement and, for most firms, K-factor requirements.
Application fee	A fee for service set by complexity tier; check ASIC's current schedule before applying.	Set by pricing category. The FCA says most CFD firms fall into Category 6: £11,260 for 2026/27.
Decision time	No fixed statutory deadline. ASIC has reported that applications with complex models such as market making need more analysis and take longer.	By law within 6 months of a complete application, or 12 months if incomplete.
Local substance	An Australian or registered foreign company with responsible managers who meet ASIC's competence standards, adequate resources and dispute resolution membership.	A UK-established firm whose senior managers are approved by the FCA under the Senior Managers and Certification Regime, with adequate UK resources.
Retail leverage cap	30:1 for major currency pairs; 20:1 for minor pairs, gold and major indices; 10:1 for other commodities and minor indices; 5:1 for shares and other assets; 2:1 for crypto-assets.	30:1 for major currency pairs; 20:1 for non-major pairs, gold and major indices; 10:1 for other commodities and non-major indices; 5:1 for individual equities; 30:1 for CFDs on certain government bonds (stricter than ESMA's 5:1).
Negative balance protection	Required for retail clients under the CFD product intervention order, together with standardised margin close-out and a ban on certain inducements.	Required for retail clients on a per-account basis; positions must be closed out when funds fall to 50% of the margin needed.
Client money	Client money must be held in a trust account under the Corporations Act client money rules.	Client money must be held under the FCA's client assets (CASS) rules.
Compensation scheme	No dedicated compensation fund for OTC derivative clients. Licensees must belong to AFCA, the external complaints scheme.	FSCS: up to £85,000 per eligible person, per firm, for investment claims where the firm failed after 1 April 2019.

	Australia	United Kingdom
Cross-border passport	No passport; an AFSL covers financial services in Australia.	No EU passport since Brexit. A UK license covers UK business; clients abroad are subject to the rules of their own country.
Public register	ASIC professional registers (AFS licensees) [2]	FCA Financial Services Register [4]

Each figure is sourced in the license guide, where every line carries its own reference.

Frequently asked questions

Which license costs more to hold, Australia or the United Kingdom?

Australia: Net tangible assets of at least the greater of A$1,000,000 or 10% of average revenue, with at least half of the required amount in cash or cash equivalents. The United Kingdom: Permanent minimum requirement of £75,000, £150,000 or £750,000 depending on permissions; £750,000 for a firm that deals on its own account, as a market-making CFD provider does. Own funds must also cover the fixed overheads requirement and, for most firms, K-factor requirements. Capital is only the floor: running costs (staff, audit, compliance, technology) usually exceed it.

Can retail clients use the same leverage under both licenses?

Australia: 30:1 for major currency pairs; 20:1 for minor pairs, gold and major indices; 10:1 for other commodities and minor indices; 5:1 for shares and other assets; 2:1 for crypto-assets. The United Kingdom: 30:1 for major currency pairs; 20:1 for non-major pairs, gold and major indices; 10:1 for other commodities and non-major indices; 5:1 for individual equities; 30:1 for CFDs on certain government bonds (stricter than ESMA's 5:1).

What happens to client money if the broker fails?

Australia: No dedicated compensation fund for OTC derivative clients. Licensees must belong to AFCA, the external complaints scheme. The United Kingdom: FSCS: up to £85,000 per eligible person, per firm, for investment claims where the firm failed after 1 April 2019.

Can a firm with one of these licenses serve clients in other countries?

Australia: No passport; an AFSL covers financial services in Australia. The United Kingdom: No EU passport since Brexit. A UK license covers UK business; clients abroad are subject to the rules of their own country.

See also

- Forex license in Australia
- Forex license in the United Kingdom
- UK (FCA) vs Cyprus (CySEC): forex licenses compared
- Singapore (MAS) vs Australia (ASIC): forex licenses compared
- Switzerland (FINMA) vs UK (FCA): forex licenses compared
- US (CFTC / NFA) vs UK (FCA): forex licenses compared
- All 25 licenses in one table

References

1. Official Australian Securities and Investments Commission (ASIC) . Australia. Accessed November 2026.
2. Official ASIC professional registers (AFS licensees) . ASIC. Accessed November 2026.
3. Official Financial Conduct Authority (FCA) . United Kingdom. Accessed November 2026.
4. Official FCA Financial Services Register . FCA. Accessed November 2026.

General information, not legal or investment advice. Figures as of November 2026; confirm with the regulator before applying or opening an account.

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