

9 November 2017

Stephanie Yong
Principal Adviser, Listings Compliance
ASX Compliance Pty Ltd
20 Bridge St
Sydney NSW 2000

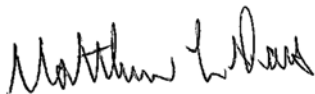
Appendix 3Y – Change of Director’s Interest Notice

I respond to your query dated 6 November 2017 regarding an announcement lodged by the Company on 4 August 2017 with respect to a change in Director’s Interest Notice for Mr Andrew Alcock.

The Appendix 3Y in question, lodged on 4 August 2017, advised of an update of securities in which director Mr Andrew Alcock has an interest, being the exercise of options in the company. In addition, this Appendix 3Y made reference to an issue of securities to Mr Andrew Alcock announced on 14 July 2017, also an exercise of options in the company.

1. While an Appendix 3B was lodged with respect to the exercise of options by Mr Andrew Alcock on 14 July 2017, an accompanying Appendix 3Y was not. This was an internal administrative oversight.
2. The Directors are periodically reminded of their disclosure obligations under Listing Rule 3.19A and the Company has in place a Market Disclosure Policy and Securities Trading Policy applicable to all Directors and staff. All Directors and staff require approval before trading in the Company’s shares.
3. The Directors have reviewed this oversight and implemented additional steps to verify the completeness of information submitted to the ASX in accordance with Listing Rule 3.19A.

Yours faithfully,



Matthew Haes
Chief Financial Officer & Company Secretary
HUB24 Limited



6 November 2017

Mr Matthew Haes
HUB24 Limited
Level 8, 20 Bridge Street
Sydney NSW 2000

By email

Dear Mr Haes

**HUB24 Limited (the “Entity”)
Appendix 3Y – Change of Director’s Interest Notice**

We refer to the following:

1. The Appendix 3Y lodged by the Entity with ASX Limited (“ASX”) on 4 August 2017 for Mr Andrew Alcock.
2. Listing rule 3.19A which requires an entity to tell ASX the following:

3.19A.1 The notifiable interests of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) at the following times.

- *On the date that the entity is admitted to the official list.*
- *On the date that a director is appointed.*

The entity must complete Appendix 3X and give it to ASX no more than 5 business days after the entity’s admission or a director’s appointment.

3.19A.2 A change to a notifiable interest of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust). The entity must complete Appendix 3Y and give it to ASX no more than 5 business days after the change occurs.

3.19A.3 The notifiable interests of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) at the date that the director ceases to be a director. The entity must complete Appendix 3Z and give it to ASX no more than 5 business days after the director ceases to be a director.

3. Listing rule 3.19B which states as follows:

An entity must make such arrangements as are necessary with a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) to ensure that the director discloses to the entity all the information required by the entity to give ASX completed Appendices 3X, 3Y and 3Z



within the time period allowed by listing rule 3.19.A. The entity must enforce the arrangements with the director.

4. The Companies Update dated 27 June 2008, reminding listed entities of their obligation to notify ASX within 5 business days of the notifiable interests in securities held by each director and outlining the action that ASX would take in relation to breaches of listings rules 3.19A and 3.19B.

The Appendix 3Y lodged on 4 August 2017 indicates that changes in Mr Alcock's notifiable interests occurred on 14 July 2017. It appears that the Appendix 3Y should have been lodged with ASX by 21 July 2017. Consequently, the Entity may be in breach of listing rules 3.19A and/or 3.19B.

Please note that ASX is required to record details of breaches of the listing rules by listed companies for its reporting requirements.

ASX reminds the Entity of its contract with ASX to comply with the listing rules. In the circumstances ASX considers that it is appropriate that the Entity make necessary arrangements to ensure there is not a reoccurrence of a breach of the listing rules.

Having regard to listing rules 3.19A and 3.19B and Guidance Note 22: "Director Disclosure of Interests and Transactions in Securities - Obligations of Listed Entities", we ask that you answer each of the following questions:

1. Please explain why the Appendix 3Y was lodged late.
2. What arrangements does the Entity have in place with its directors to ensure that it is able to meet its disclosure obligations under listing rule 3.19A?
3. If the current arrangements are inadequate or not being enforced, what additional steps does the Entity intend to take to ensure compliance with listing rule 3.19B?

Your response should be sent to me by a return e-mail or by facsimile on facsimile number **(02) 9241 7620**. It should not be sent to the Market Announcements Office. A response is requested as soon as possible and, in any event, **no later than close of business (Sydney time) on Thursday, 9 November 2017**.

Under listing rule 18.7A, a copy of this query and your response will be released to the market, so your response should be in a form suitable for release and must separately address each of the questions asked.

If you have any queries or concerns, please contact me immediately.

Yours sincerely

[Sent electronically without signature]



Stephanie Yong
Principal Adviser, Listings Compliance (Sydney)