



Bubs Australia Limited  
ACN Insuran 742  
2-4/6 Tilley Lane, Frenchs Forest  
NSW 2086 Australia

1800 2827 2878 (1800 BUBS AUST)  
info@bubsaustralia.com

13 March 2019

Anjuli Sinniah  
Senior Advisor, Compliance (Perth)  
ASX Limited

**Appendix 3Y – Change of Director’s Interest Notice Query**

Dear Anjuli Sinniah

We refer to your letter of 13 March 2019 requesting clarification with regards to the Appendix 3Y lodged on 11 March 2019.

We will respond separately to each of the questions raised below:

**1. Please explain why the Appendix 3Y was lodged late.**

The Appendix 3Y was lodged late due to an administrative oversight during a period of considerable activity.

**2. What arrangements does BUB have in place under Listing Rule 3.19B with its directors to ensure that it is able to meet its disclosure obligations under Listing Rule 3.19A?**

The Company has made all directors aware of the requirements of Listing Rule 3.19A. When a Director participates in any share trade or transaction, that director is to notify the Company Secretary immediately.

**3. If the current arrangements are inadequate or not being enforced, what additional steps does Bub intend to take to ensure compliance with Listing Rule 3.19B.**

The Company believes that its current procedures are adequate.

Jay Stephenson  
**COMPANY SECRETARY**



13 March 2019

Mr Jay Stephenson

By email:

Dear Mr Stephenson

**BUBS AUSTRALIA LIMITED ('BUB'): Appendix 3Y – Change of Director's Interest Notice Query**

ASX refers to the following:

1. BUB's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 11 March 2019 for Ms Kristy Carr (the 'Notice');
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) including whether the change occurred during a closed period where prior written clearance was required and, if so, whether prior written clearance was provided. 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 that:

*"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."*

The Notice indicates that a change in Ms Carr's notifiable interest occurred on 28 February 2019. It appears that the Notice should have been lodged with ASX by 8 March 2019. Consequently, BUB may have breached 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 entities for its reporting requirements.

ASX reminds BUB of its contract with ASX to comply with the Listing Rules. In the circumstances, BUB should make necessary arrangements to ensure it does not continue to breach the Listing Rules.

**Request for Information**

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Under Listing Rule 18.7, we ask that you answer each of the following questions 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*.

1. Please explain why the Appendix 3Y was lodged late.
2. What arrangements does BUB have in place under Listing Rule 3.19B 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 BUB intend to take to ensure compliance with Listing Rule 3.19B?

When and where to send your response

Your response should be sent to me by e-mail at [ListingsCompliancePerth@asx.com.au](mailto:ListingsCompliancePerth@asx.com.au). It should not be sent to the ASX Market Announcements Office.

A response is requested as soon as possible and, in any event, no later than 9am WST on 15 March 2019.

Under Listing Rule 18.7A, a copy of this letter 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.

#### **Enquiries**

If you have any queries or concerns about any of the above, please contact me immediately.

Regards

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**Anjuli Sinniah**  
Senior Adviser, Listings Compliance (Perth)