

20 February 2023

Ms Stephanie Patchell  
Listings Compliance, Senior Adviser  
Australian Securities Exchange  
Level 40, Central Park  
152-158 St Georges Tce  
Perth WA 6000

By email: ListingsCompliancePerth@asx.com.au

Dear Stephanie

We refer to your letter of 14 February 2023 (**Letter**) and respond as follows using the numbering adopted in your Letter.

1. The Appendix 3Y's were not lodged at the time of the disposal of the shares due to an administrative oversight.
2. In accordance with Listing Rule 3.19B, Accent Resources NL (**Company**) has recently formalised the management of these disclosure arrangements and has entered into agreements with each of its directors, which places an obligation on the directors to notify the Company of a change in a director's relevant interests within the allowed time period. Further, any director wishing to trade in the Company's securities must comply with the Company's Securities Trading Policy. Upon receipt of such information, the Company has internal procedures in place to ensure that such information is communicated to the market as soon as possible. Directors are aware of their disclosure obligations and do disclose the necessary information to the Company.
3. The Company considers its arrangements and procedures are adequate and are being enforced and accordingly, does not believe any further steps are required to ensure compliance. The Company intends to ensure future timely compliance with Listing Rule 3.19B.

Yours sincerely

**Albert Zhou - Executive Chairman**





15 February 2023

Reference: 68357

Mr Robert Allen  
Company Secretary  
Accent Resources NL

By email

Dear Mr Allen

**Accent Resources NL ('ACS'): Appendix 3Y – Change of Director's Interest Notice Query**

ASX refers to the following:

1. ACS's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 14 February 2023 for Mr Jie You (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 changes in Mr You's notifiable interest occurred on 24 January 2012 and 3 February 2012. It appears that notices in respect of the changes should have been lodged with ASX by 1 February 2012 and 10 February 2012, respectively. Consequently, ACS may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Mr You may have breached section 205G of the *Corporations Act 2001* (Cth).

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## Request for Information

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 Notice was lodged late.
2. What arrangements does ACS 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 ACS intend to take to ensure compliance with Listing Rule 3.19B?

## When and where to send your response

This request is made under Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by no later than **2.00pm WST on Monday, 20 February 2023**. You should note that if the information requested by this letter is information required to be given to ASX under Listing Rule 3.1 and it does not fall within the exceptions mentioned in Listing Rule 3.1A, ACS's obligation is to disclose the information 'immediately'. This may require the information to be disclosed before the deadline set out in the previous paragraph and may require ACS to request a trading halt immediately.

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 directly to the ASX Market Announcements Office. This is to allow me to review your response to confirm that it is in a form appropriate for release to the market, before it is published on the ASX Market Announcements Platform.

## Trading halt

If you are unable to respond to this letter by the time specified above, you should discuss with us whether it is appropriate to request a trading halt in ACS's securities under Listing Rule 17.1. If you wish a trading halt, you must tell us:

- the reasons for the trading halt;
- how long you want the trading halt to last;
- the event you expect to happen that will end the trading halt;
- that you are not aware of any reason why the trading halt should not be granted; and
- any other information necessary to inform the market about the trading halt, or that we ask for.

We require the request for a trading halt to be in writing. The trading halt cannot extend past the commencement of normal trading on the second day after the day on which it is granted. You can find further information about trading halts in *Guidance Note 16 Trading Halts & Voluntary Suspensions*.

## Suspension

If you are unable to respond to this letter by the time specified above, ASX will likely suspend trading in ACS's securities under Listing Rule 17.3.

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### **Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to ACS's obligations under Listing Rules 3.1 and 3.1A and also to Guidance Note 8 *Continuous Disclosure*: Listing Rules 3.1 – 3.1B. It should be noted that ACS's obligation to disclose information under Listing Rule 3.1 is not confined to, nor is it necessarily satisfied by, answering the questions set out in this letter.

### **Release of correspondence between ASX and entity**

We reserve the right to release a copy of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

### **Questions**

If you have any questions in relation to the above, please do not hesitate to contact me.

Yours sincerely

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**Stephanie Patchell**  
Senior Adviser, Listings Compliance