

Lisa Banh  
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Exchange Centre  
20 Bridge Street  
Sydney NSW 2000

By email: [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@asx.com.au)

Dear Lisa

**Re: Appendix 3X – Initial Director’s Interest Notice Query**

AJ Lucas Group Limited (ASX: AJL) refers to your letter dated 24 October 2024. Please see our responses below to each of the questions in your letter. Capitalised terms used and not otherwise defined in this letter have the meaning given to them in your letter.

- 1 Please explain why the Appendix 3X has not been lodged.  
An Appendix 3X was lodged promptly on the date of receipt of your letter. The late lodgement of the Appendix 3X was due to an administrative oversight.
- 2 What arrangements does AJL 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?  
AJL has robust reporting and notification processes in place to ensure compliance with its disclosure requirements under the ASX Listing Rules, and its Directors are aware of their obligations under ASX Listing Rules 3.19A. In this instance, the Director gave AJL the required information at the time of his appointment, however lodgement of an Appendix 3X reflecting that information was overlooked by inadvertence.
- 3 If the current arrangements are inadequate or not being enforced, what additional steps does AJL intend to take to ensure compliance with Listing Rule 3.19B?  
AJL further confirms that the late lodgement of an Appendix 3X in this instance was an isolated incident. AJL has reviewed its processes and believes that its current arrangements are adequate.

Yours faithfully,

A handwritten signature in black ink, appearing to read "M. Swierkowski".

Marcin Swierkowski  
Chief Commercial Officer and Company Secretary



24 October 2024

Reference: 102175

Mr Marcin Swierkowski  
Company Secretary  
AJ Lucas Group Limited  
Level 22, 167 Eagle Street  
Brisbane QLD 4000

By email:

Dear Mr Swierkowski

**AJ Lucas Group Limited ('AJL'): Appendix 3X – Initial Director's Interest Notice Query**

ASX refers to the following:

1. AJL's announcement lodged on the ASX Market Announcements Platform ('MAP') on 4 October 2024 confirming the appointment of Mr Greg Runge as Group CEO and Managing Director of AJL effective on 4 October 2024;

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.'*

As the Notice indicated that Mr Runge was appointed on 4 October 2024, it appears that the Notice should have been lodged with ASX by 11 October 2024. As the Notice has not been lodged, it appears that AJL may

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have breached listing rules 3.19A and/or 3.19B. It also appears that Mr Runge may have breached section 205G of the *Corporations Act 2001* (Cth).

### **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 Appendix 3X has not been lodged.
2. What arrangements does AJL 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 AJL 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 **2:00 PM AEDT Monday, 28 October 2024**. 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, AJL'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 AJL to request a trading halt immediately.

Your response should be sent to me by e-mail at [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@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 AJL'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 AJL'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 AJL'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 AJL'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**

ASX reserves the right to release all or any part of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Kind regards

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ASX Compliance