

5 February 2018

**By email:**

[andrew.kabega@asx.com.au](mailto:andrew.kabega@asx.com.au)

cc: [andrew.black@asx.com.au](mailto:andrew.black@asx.com.au)

Dear Mr Kabega,

**Response to ASX letter: Directors' Interest Notices**

We refer to your letter of 31 January 2018.

In response to your questions and using your numbering:

1. The Appendix 3X and 3Z were lodged late due to a miscommunication as to the requirements for ASX lodgement.
2. GetSwift has updated its directors as to the requirements for continuous disclosure obligations under Listing Rule 3.19B to ensure that it is able to meet its disclosure obligations under Listing Rule 3.19A.
3. GetSwift continues to work with PricewaterhouseCoopers in relation to compliance with the Listing Rules.

Yours sincerely

**Joel Macdonald**  
**Managing Director**





31 January 2018

Mr Phillip Hains  
Company Secretary  
Getswift Limited  
Level 2, 36 Bridge Street  
Sydney, NSW 2000

By email: [phillip@thecfo.com.au](mailto:phillip@thecfo.com.au)

Dear Mr Hains,

**Getswift Limited (the “Entity”): Appendix 3X & 3Z – Change of Director’s Interest Notice**

We refer to the following;

1. The Appendix 3X lodged by the Entity with ASX on Wednesday 31 January 2018 for Ms. Nevash Pillay (the “Appendix 3X”); and
2. The Appendix 3Z lodged by the Entity with ASX on Wednesday 31 January 2018 for Ms. Jamila Gordon (the “Appendix 3Z”);
3. 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.

4. 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.

As the Appendix 3X indicated that the director was appointed on 4 December 2017 it appears that the Appendix 3X should have been lodged with ASX by 11 December 2017. As the Appendix 3X was lodged on 31 January 2018, it appears that the Entity may be in breach of listing rules 3.19A and/or 3.19B.

Further, the Appendix 3Z indicated that the director ceased to be a director on 20 November 2017 it appears the Appendix 3Z should have been lodged with ASX by 27 November 2017. As it was lodged on 31 January 2018, it appears that there may have been a further breach by the Entity 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 entities 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*, under listing rule 18.7 we ask that you answer each of the following questions.

1. Please explain why the Appendix 3X & 3Z were lodged late.
2. What arrangements does the Entity 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 the Entity intend to take to ensure compliance with listing rule 3.19B?



Your response should be sent to me by e-mail at [Andrew.kabega@asx.com.au](mailto:Andrew.kabega@asx.com.au) or by facsimile on facsimile number (02) 9241 7620. It should not be sent to the ASX Market Announcements Office.

A response is requested as soon as possible and, in any event, not later than half an hour before the start of trading **(i.e. before 9.30 a.m. A.E.S.T.) on Monday, 5 February 2018.**

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.

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

Yours sincerely

*[Sent electronically without signature]*

Andrew Kabega  
**Senior Adviser, Listings Compliance (Sydney)**