

19 November 2018

Ms Isabella Wong
ASX Limited
Level 4, Exchange Centre
20 Bridge Street
SYDNEY NSW 2000

Response to ASX query regarding changes in director's interests - CNI

We refer to your letter dated 15 November 2018, in relation to an Appendix 3Y lodged by the Company on 7 November 2018 for Jason Huljich, and respond to the questions raised in your letter as follows:

1. The Appendix 3Y was lodged late due to an administrative oversight. Upon discovery of this oversight, the documents were prepared and lodged as soon as possible.
2. The Company and the Directors are aware of their obligations under ASX Listing Rule 3.19A. Upon joining the Board, each director is made aware of their obligations to notify the Company should there be a change in their notifiable interest so that the Company can make appropriate disclosures.
3. The procedures in place in relation to the disclosure of trading in securities have been reviewed and are being updated.



Anna Kovarik
Company Secretary



15 November 2018

Ms Anna Kovarik
Company Secretary
Centuria Capital Group
Level 39 100 Miller Street
North Sydney 2060

By email:

Dear Ms Kovarik

Centuria Capital Group (the “CNI”) Appendix 3Y – Change of Director’s Interest Notice

We refer to the following;

1. The Appendix 3Y lodged by CNI with ASX Limited (“ASX”) on 7 November 2018 for Jason Huljich (the “Appendix 3Y”);
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 indicate that a change in director's notifiable interest occurred on 7 August 2018 and 23 October 2018. It appears that the Appendix 3Y should have been lodged with ASX by 14 August 2018 for the off-market transfer between registered holders of indirect interests, and 30 October 2018 for the participation in the institutional component of the entitlement offer. Consequently, the Company 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 CNI of its contract with ASX to comply with the listing rules. In the circumstances, ASX considers that it is appropriate that CNI 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 CNI 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 CNI intend to take to ensure compliance with listing rule 3.19B?

Your response should be sent to me by e-mail. 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 AM AEDT) on Monday, 19 November 2018.**

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]

Isabella Wong
Adviser, Listings Compliance (Sydney)