

11 April 2019

Propertylink (Holdings) Limited (ACN 092 684 798)
Propertylink Investment Management Limited (ACN 136 865 417)(AFSL 338189)
As responsible entity of Propertylink Trust (ARSN 613 032 750) and
Propertylink Australian Industrial Partnership (ARSN 613 032 812)

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Mr Elvis Onyura
Senior Adviser
ASX Listings Compliance (Sydney)
Australian Securities Exchange
Sydney NSW 2000

By email

Dear Mr Onyura

RE: Propertylink Group ('Propertylink'): Appendix 3X – Initial Directors' Interest Notice Query

We refer to your letter dated 5 April 2019 and your request for information under Listing Rule 18.7.

Propertylink places importance on complying with its obligations and I can confirm that Propertylink has a process in place with its Directors to ensure timely notification and lodgement with the ASX in accordance with ASX Listing Rule 3.19A. This process is ordinarily effective in ensuring that we receive and disclose all information required by Listing Rule 3.19B in time to comply with our obligations.

Unfortunately, a combination of factors led to an administrative oversight in the timely lodgement of Appendix 3X's for three Directors appointed on 20 March 2019. However, as you will appreciate:

- Propertylink itself identified the oversight and then rectified it with the lodgements on 5 April 2019;
- none of the relevant Directors held any Propertylink securities; and
- Propertylink securities have been suspended from trading on the ASX since 21 March 2019 following the despatch of compulsory acquisition notices by ESR Real Estate (Australia) Pty Ltd and therefore the delay in lodgements have not been relevant to the market.

In the circumstances, we trust that the ASX will accept this explanation and our apology for the oversight.

Finally, I confirm that Propertylink considers the current arrangements to be adequate to ensure future compliance with ASX Listing Rule 3.19B.

Yours sincerely



Rebekah Hourigan

Company Secretary



5 April 2019

Reference: ODIN00280

Ms Rebekah Hourigan
Company Secretary
Level 29
20 Bond Street
Sydney NSW 2000

By email

Dear Ms Hourigan

Propertylink Group ('PLG'): Appendix 3X – Initial Directors' Interest Notice Query

ASX refers to the following:

1. PLG's announcement lodged on the ASX Market Announcements Platform ('MAP') on 20 March 2019 confirming the appointment of Mr Paul McKenna, Mr Andrew Fitzpatrick and Mr Jospheh Gagnon as directors of PLG effective on 20 March 2019;
2. PLG's Appendices 3X lodged on the ASX Market Announcements Platform ('MAP') on 5 April 2019 for Mr McKenna, Mr Fitzpatrick and Mr Gagnon (the 'Notices');
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 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 Notices indicated that Messrs McKenna, Fitzpatrick and Gagnon were appointed on 20 March 2019, it appears that the Notices should have been lodged with ASX by 27 March 2019. As the Notices were lodged on 5 April 2019, it appears that PLG 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 PLG of its contract with ASX to comply with the Listing Rules. In the circumstances, PLG should make necessary arrangements to ensure it does not continue to breach the Listing Rules.

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 Appendices 3X were lodged late.
2. What arrangements does PLG 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 PLG 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 ListingsComplianceSydney@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 half an hour before the start of trading (i.e. before 9:30 am AEST) on 17 April 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.

Yours sincerely

Elvis Onyura
Senior Adviser, Listings Compliance (Sydney)