

27 September 2019

George Tharian  
Senior Adviser, Listings Compliance (Sydney)  
ASX Limited  
20 Bridge Street  
SYDNEY NSW 2000

By email: ListingsComplianceSydney@asx.com.au

Dear George,

**Re Appendix 3Y – Change of Director's Interest Notice Query**

We refer to your letter of 25 September 2019 to LawFinance Limited (**Company**) and adopting similar paragraph numbering as contained therein we respond as follows:

1. The Appendix 3Y for Mr Murphy, lodged on 24 September 2019, was lodged one day late due to an internal administrative error.
2. Each Director of the Company is aware of their disclosure obligation relating to any change of their interests in the Company. The Company has a notification process under its Securities Trading Policy, where Directors must notify the Company Secretary of any trading in the Company's securities. The Company confirms that the Directors are aware and have been reminded of their obligations when dealing with Company securities.
3. The Company believes that its current practices are adequate to ensure compliance with ASX Listing Rule 3.19B.

We trust this answers your queries.

Yours faithfully



Dean Jagger  
Company Secretary



25 September 2019

Reference: 07632

Mr Dean Jagger  
Company Secretary  
LawFinance Limited  
Level 16, 56 Pitt Street  
Sydney NSW 2000

By email

Dear Mr Jagger

**LawFinance Limited (the 'Company'): Appendix 3Y – Change of Director's Interest Notice Query**

ASX refers to the following:

1. The Company's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 24 September 2019 for Mr Anthony Murphy (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 a change in Mr Murphy's notifiable interest occurred on 16 September 2019 and 19 September 2019. Given the change in Mr Murphy's notifiable interest on 16 September 2019, it appears that the Notice should have been lodged with ASX by 23 September 2019. Consequently, the Company 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 the Company of its contract with ASX to comply with the Listing Rules. In the circumstances, the Company 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 Appendix 3Y was lodged late.
2. What arrangements does the Company 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 Company 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](mailto: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 30 September 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

---

**George Tharian**  
Senior Adviser, Listings Compliance (Sydney)