



ABN 23 003 669 163

30 January 2020

**Ms Puja Patel**

Advisor, Listings Compliance (Sydney)  
ASX Compliance Pty Limited  
20 Bridge Street  
SYDNEY NSW 2000

**Integrated Green Energy Solutions Limited: ASX query**

Dear Ms Patel,

Integrated Green Energy Solutions Ltd (“IGE” or “the Company”) refers to your letter dated 24 January 2020 and comments as follows (using your numbering and inserting the questions in bold). The Company’s apologies for its delayed response, which has been caused by delays associated with responding to the ASX’s query letter dated 22 January 2020.

**1. Please explain why the Appendices 3Y were lodged late.**

The directors notified the Company of the changes to their relevant interests prior to the change occurring, in mid-November 2019. The Appendices 3Y were lodged late due to an oversight on behalf of the Company as it was returning from its holiday closure. Upon discovery of this oversight, the documents were prepared and lodged as soon as possible.

**2. What arrangements does IGE 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?**

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 the appropriate disclosures. The Company’s Trading Policy also sets out this requirement.

**3. If the current arrangements are inadequate or not being enforced, what additional steps does IGE intend to take to ensure compliance with Listing Rule 3.19B?**

The Company believes that its current practices are adequate to ensure compliance with Listing Rule 3.19B. The Company has now published internally a continuous improvement procedure as part of our quality procedures manual that addresses how such items will be addressed internally by the Company in the future and ensure we meet this timeframe.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "S. Clark", is written over a light blue horizontal line.

Stuart Clark  
**Managing Director**



24 January 2020

Reference: 12976

Mr Joshua Herbertson  
Company Secretary  
Integrated Green Energy Solutions Ltd  
Suite 306  
781 Pacific Highway  
Chatswood NSW 2067

By email: jherbertson@igesolutions.org

Dear Mr Herbertson

**Integrated Green Energy Solutions Ltd ('IGE'): Appendix 3Y – Change of Director's Interest Notice Query**

ASX refers to the following:

1. IGE's Appendix 3Ys lodged on the ASX Market Announcements Platform ('MAP') on 21 January 2020 (the 'Notices') for Mr David McIntosh, Mr Paul Dickson and Mr Bevan Dooley (the 'Directors').
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 Notices indicates that a change in the Directors' notifiable interest occurred on 9 January 2020. It appears that the Notices should have been lodged with ASX by 16 January 2020. Consequently, IGE may have breached Listing Rules 3.19A and/or 3.19B.

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## 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 3Y were lodged late.
2. What arrangements does IGE 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 IGE 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 AEDT) on 30 January 2020.

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

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**Puja Patel**  
Adviser, Listings Compliance (Sydney)