

Your reference: 45178

14 January 2022  
Ms Maria Clemente  
Senior Adviser, Listings Compliance (Sydney)  
ASX Limited

By email: [Maria.Clemente@asx.com.au](mailto:Maria.Clemente@asx.com.au)

Dear Ms Clemente

**RE: Chimeric Therapeutics Limited ('CHM'): Appendix 3Y – Change of Director's Interest Notice Query**

We refer to your letter dated 13 January 2022 regarding the three Appendices 3Y lodged on the ASX Market Announcements Platform on 14 December 2021. The Company's responses to the numbered questions set out in the letter are as follows:

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

The Appendices 3Y reflected the issue on 3 December 2021 of unlisted options approved by shareholders at the Annual General Meeting held on 22 November 2021, and the issue of shares as part of a sign on payment disclosed in section 9.8 of the Prospectus lodged on 18 January 2021.

An internal review process identified on 13 December 2021 that the corresponding Appendices 3Y had not been issued within the required five business days due to an administrative oversight.

**2. What arrangements does CHM 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?**

CHM maintains a Securities Trading Policy, available at [chimerictherapeutics.com/investors/#corporate-charters](http://chimerictherapeutics.com/investors/#corporate-charters)

The Securities Trading Policy includes the requirement for directors to provide information to the Company to ensure compliance with all aspects of the Corporations Act and Listing Rules. There are arrangements in place with each Director to provide the necessary information to enable CHM to comply with the Listing Rules.

The Directors have adhered to the Securities Trading Policy on this occasion.

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

CHM considers its current policies and procedures are adequate and whilst the Company's internal controls have identified the delayed lodgment, additional controls for the issue of securities have been introduced to avoid a recurrence of this situation.

Yours Sincerely

Phillip Hains  
Company Secretary



13 January 2022

Reference: 45178

Mr Phillip Hains  
Company Secretary and Chief Financial Officer  
Chimeric Therapeutics Limited

By email: Phillip@thecfo.com.au

Dear Mr Hains

**Chimeric Therapeutics Limited ('CHM'): Appendix 3Y – Change of Director's Interest Notice Query**

ASX refers to the following:

1. CHM's Appendices 3Y lodged on the ASX Market Announcements Platform ('MAP') on 14 December 2021 for Ms Jennifer Chow, Ms Cindy Elkins and Mr George Matcham (the 'Notices');
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 indicate that a change in the respective directors' notifiable interests occurred on 3 December 2021. It appears that the Notices should have been lodged with ASX by 10 December 2021. Consequently, CHM 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 CHM 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 CHM intend to take to ensure compliance with Listing Rule 3.19B?

## When and where to send your response

This request is made under Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by no later than **12:00 PM AEDT Monday, 17 January 2022**. You should note that if the information requested by this letter is information required to be given to ASX under Listing Rule 3.1 and it does not fall within the exceptions mentioned in Listing Rule 3.1A, CHM's obligation is to disclose the information 'immediately'. This may require the information to be disclosed before the deadline set out in the previous paragraph and may require CHM to request a trading halt immediately.

Your response should be sent to me by e-mail. It should not be sent directly to the ASX Market Announcements Office. This is to allow me to review your response to confirm that it is in a form appropriate for release to the market, before it is published on the ASX Market Announcements Platform.

## Trading halt

If you are unable to respond to this letter by the time specified above, you should discuss with us whether it is appropriate to request a trading halt in CHM's securities under Listing Rule 17.1. If you wish a trading halt, you must tell us:

- the reasons for the trading halt;
- how long you want the trading halt to last;
- the event you expect to happen that will end the trading halt;
- that you are not aware of any reason why the trading halt should not be granted; and
- any other information necessary to inform the market about the trading halt, or that we ask for.

We require the request for a trading halt to be in writing. The trading halt cannot extend past the commencement of normal trading on the second day after the day on which it is granted. You can find further information about trading halts in *Guidance Note 16 Trading Halts & Voluntary Suspensions*.

## Suspension

If you are unable to respond to this letter by the time specified above, ASX will likely suspend trading in CHM's securities under Listing Rule 17.3.

## Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to CHM's obligations under Listing Rules 3.1 and 3.1A and also to *Guidance Note 8 Continuous Disclosure: Listing Rules 3.1 – 3.1B*. It should be noted that CHM's

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obligation to disclose information under Listing Rule 3.1 is not confined to, nor is it necessarily satisfied by, answering the questions set out in this letter.

**Release of correspondence between ASX and entity**

We reserve the right to release a copy of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

**Questions**

If you have any questions in relation to the above, please do not hesitate to contact me.

Yours sincerely

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**Maria Clemente**  
Senior Adviser, Listings Compliance (Sydney)