

Jatcorp (ASX: JAT), at the forefront of innovative technology servicing the world's largest retail markets. With a track record of successful product development and distinguished technology. JAT is a leading producer of supplementary food and plant-based products.



13 December 2023

**Listings Compliance**  
**ASX Limited**  
**By email**

## **Jatcorp Limited ('JAT'): Appendix 3Y – Change of Director's Interest Notice Query**

We refer to your letter dated 11 December 2023 concerning an Appendix 3Y lodged on 4 December 2023 (**Appendix 3Y**) concerning shares purchased on 23 and 24 November 2023 (**Relevant Trade**). JAT's answers to your questions are as follows:

### **1. Please explain why the Appendix 3Y was lodged late.**

A director of JAT, Mr Zhan Wang, has been buying JAT shares on market and regularly advising JAT's Company Secretary of this as part of his obligations under an agreement with JAT to do so. As a consequence, JAT has been regularly lodging ASX Appendix 3Y's for him.

As referred to in the Appendix 3Y, Mr Wang placed a small standing order with a broker at \$0.0325 per share which completed on 28 November 2023, however the Relevant Trades occurred before then. Details are as follows:

<b>Date of trade</b>	<b>No of Shares</b>	<b>Price</b>
23 November 23	5,653	\$0.325
24 November 23	1,667	\$0.325

The director did not realise that the trades had completed because of human error and because they were for relatively small amounts. He had completed other trades before and after this time, and in fact lodged an Appendix 3Y on 27 November 2023 that could have included the Relevant Trades, had he been aware of them. There was therefore no intent to not properly disclose share trading.

### **2. What arrangements does JAT 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?**

JAT has an agreement with directors requiring them to disclose trading in JAT securities, and this has been generally followed by directors. Director trading in securities is also a standing item on Board agendas.

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

JAT considers that the current arrangements are adequate in that the late lodgement was caused by human error which is unlikely to re-occur.

Yours sincerely

Oliver Carton  
Company Secretary

Ph: +61 02 8098 0232

**About Jatcorp Limited**

*Jatcorp (ASX: JAT), at the forefront of innovative technology servicing the world's largest retail markets. With a track record of successful product development and distinguished technology, JAT is a leading producer of supplementary food products, plant-based products and dairy food products.*



11 December 2023

Reference: 86038

Mr Oliver Carton  
Company Secretary  
Jatcorp Limited  
502-2 Blight Street  
Sydney NSW 2000

By email

Dear Mr Carton

**Jatcorp Limited ('JAT'): Appendix 3Y – Change of Director's Interest Notice Query**

ASX refers to the following:

1. JAT's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 4 December 2023 for Mr Zhan Wang (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 changes in Mr Wang's notifiable interest occurred between 23 and 28 November 2023. It appears that changes that occurred on 23 and 24 November should have been lodged with ASX by 30 November and 1 December 2023 respectively. Consequently, JAT 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 Appendix 3Y was lodged late.
2. What arrangements does JAT 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 JAT 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 **3:00 PM AEDT Thursday, 14 December 2023**. 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, JAT'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 JAT to request a trading halt immediately.

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 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 JAT'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 JAT's securities under Listing Rule 17.3.

## Listing Rules 3.1 and 3.1A

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In responding to this letter, you should have regard to JAT'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 JAT's 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**

ASX reserves the right to release all or any part of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Yours sincerely

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ASX Compliance