

Mr Stuart Roberts Adviser, Listings Compliance ASX Limited 20 Bridge Street Sydney NSW 2000

By email: ListingsComplianceSydney@asx.com.au

17 May 2024

Dear Mr Roberts.

Future Generation Global Limited ('FGG'): Appendix 3Y - Change of Director's Interest Notice Query

FGG refers to your letter dated 16 May 2024 (ASX Letter) and has the following responses to the questions raised in that letter (using your numbering). Terms defined in the ASX Letter have the same meanings in this letter.

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

The Appendix 3Y notified the disposal of 294,118 FGG shares. In previous Appendix 3Ys, Ms Grant had included an indirect interest in AJG Co Limited which held those 294,118 FGG shares. AJG Co Limited and the shares held by AJG Co Limited were controlled by a family member of Ms Grant. This was an administrative oversight as Ms Grant did not at any time hold any control or influence over the FGG shares held by AJG Co Limited.

The Appendix 3Y was lodged late for the reasons set out in the response to Question 2 below.

2. What arrangements does FGG 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?

FGG has standard alerts set up for all FGG director interests with FGG's share registry Boardroom, and controls are in place to lodge Appendix 3Ys by the stipulated time to ensure that its directors are able to meet their disclosure obligations under Listing Rule 3.19A. As the 294,118 FGG shares were not controlled by Ms Grant, these shares were not part of the alerts, but were inadvertently included in previous Appendix 3Ys of Ms Grant.

As soon as FGG and Ms Grant became aware of this, FGG promptly corrected the disclosure and sought to explain this in the Appendix 3Y announced to the ASX on 2 May 2024.

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

Not applicable.

Yours sincerely,

Jesse Hamilton
Joint Company Secretary

Manuto

Future Generation Global Limited





16 May 2024

Reference: 94529

Mr Mark Licciardo Joint Company Secretary Future Generation Global Limited Level 26, Governor Philip Tower, 1 Farrer Place Sydney NSW 2000

By email: m.licciardo@acclime.com

Dear Mr Licciardo

#### Future Generation Global Limited ('FGG'): Appendix 3Y - Change of Director's Interest Notice Query

ASX refers to the following:

- 1. FGG's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 2 May 2024 for Kiera Grant (the 'Notice');
- 2. Listing Rule 3.19A which requires an entity to tell ASX the following:
  - 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. 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 Kiera Grant's notifiable interest occurred on 27 February 2024. It appears that the Notice should have been lodged with ASX by 5 March 2024. Consequently, FGG may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Kiera Grant may have breached section 205G of the *Corporations Act 2001* (Cth).

## **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 FGG 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 FGG 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 9:00 AM AEST Monday, 20 May 2024. 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, FGG'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 FGG to request a trading halt immediately.

Your response should be sent to me by e-mail at <u>ListingsComplianceSydney@asx.com.au</u>. 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 FGG'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 FGG's securities under Listing Rule 17.3.

#### Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to FGG'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 FGG'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			

# **ASX** Compliance

CC: Jesse Hamilton (Joint Company Secretary), FGG – jesse@wilsonassetmanagement.com.au Sujani Goonatilleka, Acclime – s.goonatilleka@acclime.com