



9 December 2024

Listing Compliance  
Renee Hutchens  
T: +61 2 9227 0890  
E: renee.hutchens@asx.com.au  
E: ListingsComplianceSydney@asx.com.au

Reference: 104244

**RE: SOCO Corporation Ltd ('SOC'): Appendix 3Y — Change of Director's Interest Notice Query**

Dear Renee,

Thank you for your correspondence dated 6 December 2024 in relation to the late lodgement of SOC's Appendix 3Y for Sebastian Rizzo, to which I provide the following answers as requested.

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

The Appendix 3Y was lodged late, due to an administrative procedural oversight. When undertaking a regular review of the Company's Directors' Interest register, this oversight was identified, and corrective action taken. We note that the change in Directors Interest was effectively disclosed in the Appendix 3G that was lodged with the ASX on 8 November 2024.

*2. What arrangements does SOC 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 has the following arrangements with its Directors for meeting their shareholder interest disclosure obligations.

- a) The Company and its' Directors are aware of their obligations under the Listing Rules, including Listing Rule 3.19A and 3.19B.
- b) The Company retains a professional corporate secretarial provider to support compliance of ASX notification requirements.
- c) The Company complies with Guidance Note 22 and Listing Rule 3.19B's requirement to have arrangements in place for directors to disclose to the Company all the information required to give the ASX completed Appendices 3X, 3Y and 3Z's within the requisite five business days.
- d) Director's shareholder interests' reviews are undertaken regularly.

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

Whilst the Company considers the late lodgement an isolated incident, the Company has reviewed its' procedures, and relevant policy and believes its' disclosure arrangements are appropriate and adequate.

Notwithstanding the corrected oversight, the company has taken an additional step and set up an automatic alert within the company's share registry portal ("Automic") that will alert the Company Secretary of any changes in director holdings.

We regret the late lodgement, and we will ensure future timely compliance with ASX Listing Rule 3.19A and 3.19B.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'sp', is positioned above the printed name and title of the signatory.

Stephen Parks  
CFO & Company Secretary  
SOCO Corporation Ltd



6 December 2024

Reference: 104244

Mr Stephen Parks  
Chief Financial Officer and Company Secretary  
SOCO Corporation Ltd

By email: [steve.parks@soco.com.au](mailto:steve.parks@soco.com.au)

Dear Mr Parks

### **SOCO Corporation Ltd ('SOC'): Appendix 3Y – Change of Director's Interest Notice Query**

ASX refers to the following:

1. SOC's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 5 December 2024 for Mr Sebastian Rizzo (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 Rizzo's notifiable interest occurred on 8 November 2024. It appears that the Notice should have been lodged with ASX by 15 November 2024. Consequently, SOC may have breached Listing Rules 3.19A and/or 3.19B.

### **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 SOC 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 SOC 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 **5:00 PM AEDT Wednesday, 11 December 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, SOC'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 SOC 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 S's securities under Listing Rule 17.1. If you wish a OCct 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 SOC's securities under Listing Rule 17.3.

#### **Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to SOC'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 SOC'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.

Kind regards

---

ASX Compliance