



ASX Announcement

Appendices 3X and 3Z – Query Letter

Sydney, December 12, 2024 – Medlab Clinical Ltd (ASX:MDC) (“Medlab” or “the Company”) is releasing the following update to stakeholders.

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 3X and Appendix 3Z were lodged late.

The Company’s ability to make the announcements was hindered with on-going discussions regarding the new entity structure

2. What arrangements does MDC 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?

Advance planning and communication will be made to ensure timely disclosures, under Listing Rule 3.19A

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

Revised internal corporate governance policies will be in place to ensure compliance with Listing Rule 3.19A

-ENDS-

Announcement authorised by Medlab Clinical Ltd Board of Directors



11 December 2024

Reference: 104124

Mr Kerem Kaya
Company Secretary
Medlab Clinical Limited
Level 2 50 Kings Park Rd West
PERTH WA 6005

By email

Dear Mr Kaya

Medlab Clinical Limited ('MDC'): Appendices 3X and 3Z – Query Letter

ASX refers to the following:

1. MDC's:

- 1.1 Appendix 3X lodged on the ASX Market Announcements Platform ('MAP') on 4 December 2024 for Mr Joshua David Light (the 'First Notice'); and
- 1.2 Appendix 3Z lodge on MAP on 4 December 2024 for Mr Matt Hudson (the 'Second 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.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 First Notice indicated that Mr Light was appointed on 19 November 2024, it appears that the First Notice should have been lodged with ASX by 26 November 2024. As the First Notice was lodged on 4 December 2024, it appears that MDC may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Mr Light may have breached section 205G of the *Corporations Act 2001* (Cth).

The Second Notice indicated that Mr Hudson ceased to be a director on 19 November 2024, it appears that the Second Notice should have been lodged with ASX by 26 November 2024. As the Second Notice was lodged on 4 December 2024, it appears that MDC 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 3X and Appendix 3Z were lodged late.
2. What arrangements does MDC 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 MDC 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 AEDT on Friday, 13 December 2024**.

Your response should be sent to me by e-mail at **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.

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.

Regards

ASX Compliance