



24 January 2025

ASX Compliance  
ASX Limited  
Exchange Centre  
Level 1, 20 Bridge Street  
Sydney NSW 2000

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

Dear Sirs

**Astron Corporation Limited: Appendix 3Y - Change of Director's Interest Notice Query**

We refer to your letter of 21 January 2025. Astron Corporation Limited (**ATR**) responds as follows, using the same numbering as your letter.

1. The Appendix 3Y was lodged on 14 January 2025, as that while a draft Appendix 3Y was provided to the Director whose interest had changed (Mme Rong) for review and approval on 8 January 2025, the date on which Mme Rong confirmed the details in the Appendix 3Y were correct and approved the release was 14 January 2025, as there was some delay in receiving that confirmation given Mdm Rong's travel arrangements in the intervening period.
2. ATR has written agreements with all of its recently appointed directors requiring them to notify ATR of any changes to their interests. Additionally, ATR receives alerts from its registry (Computershare) of any balance movements on its key management personnel, including directors. On ATR receiving notification from Computershare regarding the movement (in this case on 6 January 2025), ATR prepares a draft Appendix 3Y for approval of the relevant director. ATR regularly follows up approval from the relevant director to permit release of the Appendix 3Y.
3. ATR considers the arrangements currently in place are adequate and being enforced.
4. This response has been approved by ATR's Managing Director.

Yours sincerely  
**Astron Corporation Limited**

**Astron Corporation Limited**  
**31/F., 148 Electric Road North Point, Hong Kong**



Joshua Theunissen  
Australian Company Secretary



21 January 2025

Mr Joshua Theunissen  
Company Secretary  
Astron Corporation Limited  
Unit 307, 135-139 Pacific Highway  
Hornsby NSW AU 2077

By email:

Dear Mr Theunissen

**Astron Corporation Limited ('ATR'): Appendix 3Y – Change of Director's Interest Notice Query**

ASX refers to the following:

1. ATR's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 14 January 2025 for Mme Kang Rong (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 Mme Rong's notifiable interest occurred on 3 January 2025. It appears that the Notice should have been lodged with ASX by 10 January 2025. Consequently, ATR may have breached Listing Rules 3.19A and/or 3.19B.

**Request for Information**

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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 ATR 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 ATR 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 **4 PM AEDT Friday, 24 January 2025**. 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, ATR'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 ATR 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 ATR'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 ATR's securities under Listing Rule 17.3.

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

In responding to this letter, you should have regard to ATR'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 ATR's obligation

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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

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ASX Compliance