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[betr.com.au](https://betr.com.au)

23 May 2025

Yulia Gurdina  
Senior Listings Adviser  
ASX Limited  
Exchange Street  
20 Bridge Street  
Sydney, NSW 2000

By email: [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@asx.com.au)  
Reference: 109391

Dear Ms Gurdina,

**betr Entertainment Limited (ASX: BBT): Appendix 3Y – Change of Director's Interest notice Query**

betr Entertainment Holdings Limited (ASX: BBT) (**BBT**) refers to your letter dated 20 May 2025 (**Letter**). BBT has made reasonable enquiries and provides the following responses to your queries by adopting the numbering applied in the Letter:

**1. Please explain why the Appendices 3Y were lodged late.**

The Appendices 3Y were lodged late due to administrative oversight. The Company is aware of its disclosure obligations and the time requirements of such obligations under ASX listing rules 3.19A, 3.19B and 3.10 and has reviewed its reporting and notification practices. The Company believes that the arrangements in place are adequate to ensure future compliance with its disclosure obligations under the ASX Listing Rules.

**2. What arrangements does BBT 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 regular arrangements in place for Directors to notify the Company of any changes to their notifiable interests in the Company. In addition, automated reports are available from the Company's share registry in relation to any movements in a Director's interests.

**THAT'S BETR.**

As outlined above, the Company believes that the arrangements in place are adequate to ensure compliance with its disclosure obligations under the ASX Listing Rules. The Company confirms that the timing of the late lodgement of the Appendices 3Y was an isolated administrative oversight.

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

As outlined above, having made reasonable enquiries of its relevant personnel, the Company believes that the current arrangements are adequate to ensure compliance with its disclosure obligations under the ASX Listing Rules. The timing of the late lodgement was an isolated administrative oversight.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Holley', with a stylized flourish at the end.

**Darren Holley**

Chief Financial Officer & Company Secretary



20 May 2025

Reference: 109391

Mr Christopher Fernandes  
Communication Person  
betr Entertainment Limited  
Level 8 210 George Street  
SYDNEY NSW 2000

By email

Dear Mr Fernandes

**betr Entertainment Limited ('BBT'): Appendix 3Y – Change of Director's Interest Notice Query**

ASX refers to the following:

1. BBT's Appendix 3Y's lodged on the ASX Market Announcements Platform ('MAP') on 19 May 2025 for Mr Michael Sullivan and Mr Matthew Tripp (the 'Notices').
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 Notices respectively indicate that a change in Mr Sullivan's and Mr Tripp's notifiable interest occurred on 8 May 2025. It appears that the Notices should have been lodged with ASX by 15 May 2025. Consequently, BBT 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 Appendices 3Y were lodged late.
2. What arrangements does BBT 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 BBT 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 on Friday, 23 May 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, BBT'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 BBT to request a trading halt immediately.

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.

## Suspension

If you are unable to respond to this letter by the time specified above, ASX will likely suspend trading in BBT's securities under Listing Rule 17.3.

## Listing Rules 3.1 and 3.1A

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

Regards

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ASX Compliance