

08 September 2023

ASX Announcements Office

Australian Securities Exchange
Level 4, 525 Collins Street
Rialto, North Tower
Melbourne VIC 3000

Late Lodgement of Appendix 3Y – Response to ASX Query

Farm Pride Foods Limited (ASX:FRM) refers to ASX's letter dated 8 September 2023 (Letter) querying the late lodgement of Appendix 3Y – Change in Director's Interest Notice for George Palatianos, which was lodged by the Company on 8 September 2023. In response to ASX's questions in the Letter, the Company provides the following information (using the same numbering):

1. The delay in lodgement of the Appendix 3Y before 8 September 2023 was due to the Company Officer being unexpectedly called away and unable to lodge before the cut off date being 7 September 2023. Upon the Company Officer returning to the office, the Company was able to finalise and lodge Appendix 3Y with ASX.
2. Every Director of the Company is aware of ASX Listing Rule 3.19A and their obligations to provide the necessary information to the Company to enable it to meet its disclosure requirements.
3. The Company considers that its existing arrangements are adequate and that the late lodgement of the Appendix 3Y is an isolated incident. The Company confirms that the Directors are aware of their obligations when dealing with securities in the Company.

For and on behalf of the Board

Darren Lurie

Farm Pride Foods Ltd



8 September 2023

Reference: 79832

Mr Gavin Bruce De Lacy
Company Secretary
Farm Pride Foods Limited
PO Box 141, Noble Park
VIC 3174, Australia

By email:

Dear Mr Bruce De Lacy

Farm Pride Foods Limited ('FRM'): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. FRM's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 8 September 2023 for Mr George Palatianos (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 Palatianos's notifiable interest occurred on 31 August 2023. It appears that the Notice should have been lodged with ASX by 7 September 2023. Consequently, FRM 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 FRM 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 FRM 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 AM AEST Wednesday, 13 September 2023**. 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, FRM'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 FRM to request a trading halt immediately.

Your response should be sent to me by e-mail at ListingsComplianceMelbourne@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 FRM'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 FRM's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Questions

If you have any questions in relation to the above, please do not hesitate to contact me.

Kind regards

Ash Abdul Aziz
Adviser, Listings Compliance

CC: Angelique Belbas, Farm Pride Foods Limited