

6 May 2021

Vanessa Nevjestic
Adviser, Listings Compliance (Perth)
Australian Securities Exchange
By email: ListingsCompliancePerth@asx.com.au

Dear Vanessa

Advanced Human Imaging Limited ('AHI'): Appendix 3Y - Query

Advanced Human Imaging Limited (**Company**) refers to ASX's query letter dated 5 May 2021 and provides the following responses to the specific queries set out in that letter.

Capitalised terms which are defined in ASX's letter have the same meaning where used in this letter.

1. Dato Low was appointed as a director of the Company on 13 July 2020 (**Appointment Date**).

The Appendix 3X for Dato Low dated 16 July 2020 states that Dato Low has the following relevant interests in the Company's fully paid ordinary shares (**Shares**):

- (a) a direct interest in 357,379 Shares (**Low Shares**); and
- (b) an indirect interest in 444,989 Shares, which are held by Round Table Partners Berhad (an entity controlled by Dato Low) (**Round Table Shares**).

However, prior to the Appointment Date, Dato Low initiated an off market transaction for the sale of all of the Round Table Shares and 57,379 of the Low Shares (**Share Sale**).

On completion of the Share Sale, Dato Low directly held 300,000 Shares and held no indirect relevant interests in the Company.

The contents of the draft Appendix 3X (which was released on 16 July 2020) that was provided to Dato Low reflected the snapshot of the Share register that was provided to the Company by Automic. The Share register was not updated to reflect the effect of the Share Sale until 27 July 2020 for the Round Table Shares and 28 July 2020 for the Low Shares.

When reviewing the draft Appendix 3X, Dato Low did not appreciate that the document did not contemplate the effect of the Share Sale and erroneously approved the release of the Appendix 3X. As such, the contents of the Appendix 3X is incorrect.

The reason for the delay for the lodgement of the Appendix 3Y is because there has not been a change in Dato Low's notifiable interest since the Appointment Date. Dato Low's relevant interests in the Company changed prior to the Appointment Date.

As such, the Appendix 3Y that was released to correct the contents of the Appendix 3X, rather than notifying the market of a change of notifiable interest.

The Company does note that the market was informed of Dato Low's correct holding in its annual report for the financial year ended 30 June 2020, which was completed by a third party.

2. The Company has had a Securities Trading Policy in place since 2015, which was released on its ASX platform on 12 August 2015 (**Policy**).

The Policy is strictly enforced by the Company, to the extent that each director must contact Vlado Bosanac, the Company's CEO and Executive Director, prior to selling or acquiring Shares on or off-market.

The lodgement of the Appendix 3Y is not a result of a failure to implement the Policy (which did not apply to Dato Low at the time that the Share Sale was implemented) or of the Policy itself.

The Appendix 3Y was lodged to correct to contents of the Appendix 3X. The contents of the Appendix 3X is incorrect due to the delay in the update of the Company's Share register pursuant to the Share Sale.

3. The Company submits that the current arrangements that is has in place under Listing Rule 3.19B are adequate and are enforced.

Should you require any further clarification please do not hesitate to contact the undersigned.

Yours faithfully,



Steven Richards

Company Secretary
& Chief Financial Officer
Advanced Human Imaging Limited



5 May 2021

Reference: ODIN34379

Mr Steven Richards
Company Secretary
Advanced Human Imaging Ltd
Suite 8, 7 The Esplanade
Mt Pleasant, Western Australia 6153

By email: steven.richards@advancedhumanimaging.com

Dear Mr Richards

Advanced Human Imaging Ltd ('AHI'): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. AHI's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 4 May 2021 for Mr Dato Low Koon Poh (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 Dato Low Koon Poh's notifiable interest occurred on 16 July 2020. It appears that the Notice should have been lodged with ASX by 23 July 2020. Consequently, AHI may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Mr Dato Low Koon Poh may have breached section 205G of the *Corporations Act 2001* (Cth).

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 AHI 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 AHI 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 AWST Monday, 10 May 2021**. 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, AHI'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 AHI to request a trading halt immediately.

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

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to AHI'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 AHI'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

We reserve the right to release a copy 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.

Yours sincerely

Vanessa Nevjestic

Adviser, Listings Compliance (Perth)