

2 March 2022

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

Dear Laura

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

Advanced Human Imaging Limited (**Company**) refers to ASX's query letters dated 1 March 2022 and provides the following responses to the specific queries set out in that letter.

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

1. The Appendix 3Y's for Messrs Prosser, Melby and Greissing were lodged late due to an administrative oversight. These directors were issued the securities on 8 February 2022 after the Company received shareholder approval to do so at its Annual General Meeting held on 31 January 2022.

During the week following 8 February 2022, the Company's management was primarily focused on facilitating the leadership shift that was announced on 15 February 2022. During this time, the requirement to lodge Appendix 3Y's following the issue of securities to Messrs Prosser, Melby and Greissing was overlooked.

Once the Company became aware of this oversight, it released Appendix 3Y's for Messrs Prosser and Melby on 24 February 2022. An Appendix 3Y for Mr Greissing was released today following the identification of this oversight.

2. The Company is aware of its obligations under Listing Rule 3.19A and will ensure that the Appendix 3Y's are lodged on time moving forward.

In relation to new issues of securities, an ASX and ASIC filings checklist will be drafted in order to avoid further late lodgements.

In relation to other dealings in securities by directors, it is a term of the appointment letter for each director that directors are required to notify the Company of any dealings in securities to enable the Company to comply with its disclosure obligations under the Listing Rules and the Corporations Act.

Further, 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 Dr Katherine Iscoe, the Company's CEO and Executive Director, or Mr Prosser,

the Company's Non-Executive Chair, prior to selling or acquiring the Company's securities on or off-market.

The late lodgement of the Appendix 3Y's were not a result of a failure to implement the Policy or of the Policy itself. The securities the subject of the Appendix 3Y's were issued pursuant to shareholder approval rather than as a result of securities trading.

3. The Company submits that the current arrangements that it has in place under Listing Rule 3.19B are adequate and are enforced. The Appendix 3Y's were not lodged late because of a director's failure to notify the Company of its change in interests.

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

Yours sincerely,



Steven Richards

Company Secretary & Chief Financial Officer
Advanced Human Imaging Limited



1 March 2022

Reference: ODIN48013

Mr Steven Richards
Suite 8, 7 The Esplanade
Mt Pleasant
WA 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's lodged on the ASX Market Announcements Platform ('MAP') on 24 February 2022 for Mr Nicholas Prosser and Mr Michael Melby (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 Notice indicates that a change in Mr Prosser's and Mr Melby's notifiable interest occurred on 8 February 2022. It appears that the Notice should have been lodged with ASX within 5 days of the change in notifiable interest. Consequently, AHI 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's were 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 **10AM AWST Friday, 4 March 2022**. 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

Laura Gomme
Adviser, Listings Compliance (Perth)



1 March 2022

Reference: ODIN48078

Mr Steven Richards
Suite 8, 7 The Esplanade
Mt Pleasant
WA 6153

By email: steven.ricahrds@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 1 March 2022 for Mr Edward Greissing Jr (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.'*

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The Notice indicates that a change in Mr Greissing Jr's notifiable interest occurred on 8 February 2022. It appears that the Notice should have been lodged with ASX within 5 days of the change in notifiable interest. Consequently, AHI may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Mr Greissing Jr may have breached section 205G of the *Corporations Act 2001* (Cth).

Request for Information

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1. Please explain why the Appendix 3Y's were 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

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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.

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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.

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Laura Gomme
Adviser, Listings Compliance (Perth)