

17 April 2019

ASX Limited
Level 40, Central Park
152-158 St George's Terrace
Perth WA 6000

Via email- ListingsCompliancePerth@asx.com.au

Attention: Anjuli Sinniah, Senior Adviser, Listings Compliance (Perth)

Dear Anjuli

CFOAM Limited ('CFO '): Appendix 3Y – Change of Director's Interest Notice Query

I refer to your letter of 15 April 2019.

The Directors of CFOAM Limited (ASX Code: **CFO**) hereby reply to the ASX's Request for Information as follows:

- Please explain why the Appendix 3Y was not lodged in relation to the Purchased Securities.*

The Appendix 3Y was not lodged due to a clerical error by Mr Chandler who was travelling at the time of the share purchase and did not realise the Purchased Securities trade had been completed.
- What arrangements does CFO 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.*

The Company has an agreement with each director requiring them to disclose any changes in their securities and each director is aware of their obligations. The Company acknowledges that, in this instance, a failure in its procedures has occurred. The Company has reinforced its current policy and obligations to all of its directors.
- If the current arrangements are inadequate or not being enforced, what additional steps does CFO intend to take to ensure compliance with Listing Rule 3.19B?*

The Company believes its procedures are adequate and are being enforced and no additional steps are required. The Company apologises for this clerical error.

Please do not hesitate to contact me if you require any further clarification.

Yours faithfully

A handwritten signature in black ink that reads "G Steinepreis".

Gary Steinepreis
Director



15 April 2019

Mr Gary Steinepreis
Company Secretary

By email:

Dear Mr Steinepreis

CFOAM Limited ('CFO '): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. CFO's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 1 April 2019 for Mr Toby Chandler (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 Chandler did not report a share purchase of 10,000 shares on 31 January 2019 due to a clerical error for the value of \$1,600. The Company was required to lodge an Appendix 3Y for the relevant change on 7 February 2019 which it failed to do ("Purchased Securities"). Consequently, CFO may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Mr Chandler may have breached section 205G of the *Corporations Act 2001* (Cth).

Please note that ASX is required to record details of breaches of the Listing Rules by listed entities for its reporting requirements.

ASX reminds CFO of its contract with ASX to comply with the Listing Rules. In the circumstances, CFO should make necessary arrangements to ensure it does not continue to breach the Listing Rules.

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 not lodged in relation to the Purchased Securities.
2. What arrangements does CFO 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 CFO intend to take to ensure compliance with Listing Rule 3.19B?

When and where to send your response

Your response should be sent to me by e-mail at ListingsCompliancePerth@asx.com.au. It should not be sent to the ASX Market Announcements Office.

A response is requested as soon as possible and, in any event, no later than 3pm WST on Wednesday 17 April 2019. Under Listing Rule 18.7A, a copy of this letter and your response will be released to the market, so your response should be in a form suitable for release and must separately address each of the questions asked.

Enquiries

If you have any queries or concerns about any of the above, please contact me immediately.

Regards

Anjuli Sinniah
Senior Adviser, Listings Compliance (Perth)