

AZURE HEALTH TECHNOLOGY LIMITED

27 June 2019

Ms Isabelle Andrews
Adviser, Listings Compliance (Perth)
ListingsCompliancePerth@asx.com.au

Dear Ms Andrews

RESPONSE TO ASX APPENDIX 3Z QUERY

We refer to your letter of 25 June 2019 regarding the late lodgement of the Appendices 3Y for Mr Edward Bralower, Ms Emma Waldron and Mr Malcolm James and provide the following response.

1. Please explain why the Appendices 3Z were lodged late.

The Appendices 3Z were not lodged within the 5-business day requirement due to an administrative oversight following the effectuation of the Deed of Company Administration and the resignation of the then Directors and Company Secretary pursuant to resolutions approved by shareholders at the General Meeting held on 18 December 2018. As soon as the omission was realised the Company lodged the Appendices 3Z.

2. What arrangements does AZT have in place under Listing Rule 3.19B with its directors to ensure that it is able to meet its obligations under Listing Rule 3.19A?

The Company has appropriate arrangements in place to ensure that Directors disclose to the Company all information required for the Company to provide to the ASX completed Appendices 3X, 3Y and 3Z within the time frame allowed by Listing Rule 3.19A. The Company also has in place appropriate arrangements to ensure that procedural announcements will be lodged accurately and within the required time frame.

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

The Company believes that its current practices are adequate and ordinarily effective to ensure compliance with ASX Listing Rules 3.19A and 3.19B.

The late lodgement of the Appendices 3Z in question was an administrative oversight on the part of the Company and does not reflect a deficiency in the internal procedures.

Yours sincerely



Gregory Starr
DIRECTOR



25 June 2019

Reference: ODIN03635

Mr Gregory Starr
Company Secretary
Azure Health Technology Limited
MLC Centre Level 45 Suite 03 19-29 Martin Place
SYDNEY NSW 2000

By email:

Dear Mr Starr

Azure Health Technology Limited ('AZT'): Appendix 3Z – Final Director's Interest Notice Query

ASX refers to the following:

1. AZT's Appendices 3Z lodged on ASX Market Announcements Platform ('MAP') on 17 June 2019 for Mr Edward Bralower, Ms Emma Waldron and Mr Malcolm James (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.'

As the Appendices 3Z indicate that the directors ceased to be directors on 18 December 2018 it appears the Appendices 3Z should have been lodged with ASX by 27 December 2018. As the Appendices were lodged on 17 June 2019, it appears that AZT may have breached Listing Rules 3.19A and/or 3.19B.

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

ASX reminds AZT of its contract with ASX to comply with the Listing Rules. In the circumstances, AZT 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 Appendices 3Z were lodged late.
2. What arrangements does AZT 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 AZT 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 half an hour before the start of trading (i.e. before 9:30 am AWST) on 28 June 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.

Yours sincerely

Isabelle Andrews
Adviser, Listings Compliance (Perth)