



SPRINTEX LIMITED  
ABN: 38 106 337 599

ASX Code: SIX

18 December 2014

Anjuli Sinniah  
Adviser, Listings Compliance (Perth)  
ASX Compliance Pty Limited  
Level 40, Central Park  
152 – 158 St Georges Terrace  
PERTH WA 6000

By email: [Anjuli.Sinniah@asx.com.au](mailto:Anjuli.Sinniah@asx.com.au)

Dear Anjuli

**Sprintex Limited (the “Company”)**

We refer to your letter dated today, 18 December 2014, regarding the late lodgement of the Appendix 3Z for Mr Steven Apedaile, the Company provides the following response to your questions in the same order.

**1. Please explain why the Appendix 3Z was lodged late.**

The Appendix 3Z was lodged late due to an internal administrative oversight. The Appendix 3Z was lodged immediately upon the oversight being identified.

**2. What arrangements does the Company have in place with its directors to ensure that it is able to meet its disclosure obligations under listing rule 3.19A?**

The Company and its Directors are aware of their obligations under the ASX Listing Rules, including Listing Rule 3.19A and 3.19B. Each member of the Board is informed of the ASX disclosure requirements upon their appointment. The Company Secretary reviews the shareholdings of directors regularly to ensure all movements are reported to the ASX within the required timeframe.

**3. If the current arrangements are inadequate or not being enforced, what additional steps does the Company intend to take to ensure compliance with listing rule 3.19B?**

The Company believes that it has the necessary processes in place and will ensure that future compliance obligations are met.

The Company is committed to ensuring that no further breaches of the ASX Listing Rules occur.

Please do not hesitate to contact us if you have any further queries.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R Molkenthin', with a horizontal line underneath.

Robert Molkenthin  
Company Secretary

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18 December 2014

Mr Robert Molkenthin  
Company Secretary  
Sprintex Limited  
183 Mulgool Road  
MALAGA WA 6090

By email: [robertm@sprintex.com.au](mailto:robertm@sprintex.com.au)

Dear Robert,

**Sprintex Limited (the "Company")**

We refer to the following:

1. The Company's announcement lodged with ASX Ltd ("ASX") on 16 December 2014 regarding a final director's interest notice for Mr Steven Apedaile ("Appendix 3Z").
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 an 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). The entity must complete an 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 an 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 as follows.

*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.*

4. The Companies Update dated 27 June 2008, reminding listed entities of their obligation to notify ASX within 5 business days of the notifiable interests in securities held by each director and outlining the action that ASX would take in relation to breaches of listings rules 3.19A and 3.19B.

As the Appendix 3Z indicate Mr Apedaile ceased to be a director of the Company on 27 November 2014, the Appendix 3Z should have been lodged with the ASX by 4 December 2014. As the Appendix 3Z was lodged on 16 December 2014 it appears that the Company may be in breach of 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 companies for its reporting requirements.

ASX reminds the Company of its contract with ASX to comply with the listing rules. In the circumstances ASX considers that it is appropriate that the Company make necessary arrangements to ensure there is not a reoccurrence of a breach of the listing rules.

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", we ask that you answer each of the following questions.

1. Please explain why the Appendix 3Z was lodged late.
2. What arrangements does the Company have in place 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 the Company intend to take to ensure compliance with listing rule 3.19B?

Your response should be sent to me by e-mail to [Anjuli.Sinniah@asx.com.au](mailto:Anjuli.Sinniah@asx.com.au) or by facsimile on facsimile number +61 8 9221 2020. It should not be sent to ASX Market Announcements.

A response is requested as soon as possible and, in any event, not later than **3:00 pm WST on Monday, 22 December 2014**.

Under listing rule 18.7A, a copy of this query 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. If you have any queries or concerns, please contact me immediately.

Yours sincerely,

*[sent electronically without signature]*

Anjuli Sinniah  
**Adviser, Listings Compliance (Perth)**