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Stephanie Yong Australian Securities Exchange Limited Via email: Stephanie.Yong@asx.com.au

14 April 2015

Re: Appendix 3Y – Change of Director's Interest Notice

Dear Stephanie,

With regard to the letter to PM Capital Global Opportunities Fund Limited ("the Company"), from ASX Limited, dated 9 April 2015, querying the late lodgement of Appendix 3Y Change of Director's Interest Notice, please find query responses below:

- Please explain why the Appendix 3Y was lodged late.
 The relevant Director was late to notify the Company of his change in interest on 10 March 2015.
- 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 Directors have been reminded of the change in director's interest disclosure requirements following this late notification.
- 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's current arrangements are adequate and the Directors are aware of the requirements to disclose changes on interests. As an additional measure, the Company will add to Board meeting agendas a standing item 'Directors disclosure requirements'.

Yours faithfully,

Ursula Kay

Company Secretary

Signed for PM Capital Global Opportunities Fund

PM CAPITAL Global Opportunities Fund Limited ACN 166 064 875



14 April 2015

Ms Ursula Kay Financial Controller PM Capital Global Opportunities Fund Limited Level 27, 420 George Street Sydney NSW 2000

By email

Dear Ursula,

PM CAPITAL GLOBAL OPPORTUNITIES FUND LIMITED (THE "COMPANY") Appendix 3Y – Change of Director's Interest Notice

We refer to the following:

- 1. The Appendix 3Y lodged by the Company with ASX Limited ("ASX") on 19 March 2015 for Chris Donohoe (the "Appendix 3Y").
- 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). 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 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.

The Appendix 3Y indicates that change in Mr Donohoe's notifiable interest occurred on 10 March 2015. It appears that the Appendix 3Y should have been lodged with ASX by 17 March 2015. Consequently, 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 3Y 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?
- 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 a return e-mail or by facsimile on facsimile number **(02) 9241 7620**. It should <u>not</u> be sent to the Market Announcements Office.

A response is requested as soon as possible and, in any event, no later than close of business (Sydney time) on Tuesday, 14 April 2015.

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 should separately address each of the questions asked. If you have any queries or concerns, please contact me immediately.

Yours sincerely

[Sent electronically without signature]

Stephanie Yong
<u>Senior Adviser, Listings Compliance (Sydney)</u>