

2 April 2025

The Manager  
Listings Compliance  
ASX Limited  
20 Bridge Street  
Sydney NSW 2000

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

**Clearview Wealth Limited: Appendix 3Y – Change of Director’s Interest Notice Query**

ClearView Wealth Limited (ACN 106 248 248) (ASX:CVW) (**CVW** or **ClearView**) refers to the letter from ASX Compliance dated 31 March 2024 (**Letter**) in relation to ClearView’s Appendix 3Y lodged on the ASX Market Announcements Platform (**MAP**) on 27 March 2025 for Ms Jennifer Lyon (the ‘**Notice**’).

ClearView outlines its responses using the numbering contained in the Letter.

ClearView advises that:

- (1) The Notice was given to ASX’s MAP within 24 hours of ClearView being notified of the change of interest by Ms Lyon.

The Appendix 3Y was lodged outside the 5-business day notification period set out in Listing Rule 3.19A.2 due to unforeseen circumstances. ClearView is advised that purchase instructions were given by Ms Lyon to the broker to purchase shares (within ClearView’s share trading window) in mid-March. Ms Lyon was away during late March and unfortunately unexpectedly did not have mobile phone coverage at that time. On Ms Lyon’s return to Sydney, and when she became aware that the purchase had been executed on 12 March 2025, she immediately notified ClearView by email. The completed Appendix 3Y was lodged the following day, after review and approval by the ClearView Continuous Disclosure Committee. The omission to notify ClearView was unintentional.

- (2) As required by Listing Rule 3.19B, ClearView has in place arrangements with its directors to ensure that each director discloses to the entity all the information required by the entity to give ASX the completed Appendix 3Y under Listing Rule 3.19A. This is outlined in the ClearView *Securities Trading and Market Communications Policy*, which provides that:

*8.2 All Directors of ClearView Wealth Limited must immediately notify the Company Secretary of any trading of ClearView Securities. The Company Secretary is responsible for lodging with the ASX all Appendix 3X, 3Y and 3Z forms in respect of trading in ClearView Securities.*



In the circumstances, ClearView undertakes to remind all directors of the importance of the requirement to comply with Listing Rule 3.19B to ensure that ClearView can meet its obligations under Listing Rule 3.19A, in accordance with ClearView's policies.

ClearView will also issue a periodic reminder to all directors at or about the time of the opening of each trading window.

(3) Not applicable.

Signed for and on behalf of ClearView Wealth Limited

A handwritten signature in black ink, appearing to read 'J Beaumont', written in a cursive style.

Judilyn Beaumont  
General Counsel & Company Secretary



31 March 2025

Reference: 107745

Ms Judilyn Beaumont  
General Counsel & Company Secretary  
Clearview Wealth Limited  
15, 20 Bond Street  
SYDNEY NSW 2000

By email only.

Dear Ms Beaumont

**Clearview Wealth Limited ('CVW'): Appendix 3Y – Change of Director's Interest Notice Query**

ASX refers to the following:

1. CVW's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 27 March 2025 for Ms Jennifer Lyon (the 'Notice');
2. Listing Rule 3.19A which requires an entity to tell ASX the following:

...

**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. 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 Ms Lyon's notifiable interest occurred on 12 March 2025. It appears that the Notice should have been lodged with ASX by 19 March 2025. Consequently, CVW appears to have breached Listing Rules 3.19A and/or 3.19B. It also appears that Ms Lyon may have breached section 205G of the *Corporations Act 2001* (Cth).

**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 lodged late.

- 
2. What arrangements does CVW 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 CVW 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 **9:00 AM AEDT Thursday, 3 April 2025**. 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, CVW'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 CVW to request a trading halt immediately.

Your response should be sent by e-mail to [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@asx.com.au). It should not be sent directly to the ASX Market Announcements Office. This is to allow ASX 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 CVW'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 CVW's securities under Listing Rule 17.3.

#### **Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to CVW'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 CVW'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**

ASX reserves the right to release all or any part of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Kind regards

---

ASX Compliance