



SPRINTEX LIMITED
ABN: 38 106 337 599

ASX Code: SIX

15 December 2020

Ms Vanessa Nevjestic
Listings Compliance (Perth)
ASX Compliance Pty Limited
Level 40, Central Park
152-158 St Georges Terrace, Perth WA 6000

Via email: ListingsCompliancePerth@asx.com.au

Dear Ms Nevjestic

**RE: Sprintex Limited (“Sprintex” or the “Company”, ASX: SIX)
Appendix 3Y – Change of Director’s Interest Notice Query**

We refer to your letter dated 14 December 2020, requesting a response to your questions raised.

Sprintex’s response to each of the questions contained in your letter is as follows:

1. Please explain why the Appendix 3Y was lodged late.

The late lodgement of the Appendix 3Y was an oversight by the Company at the time of issuing the shares due to a number of factors affecting the Company at that time (as set out below).

The issue of Shares had originally been agreed with the recipients to be subject to the reinstatement of the Company’s shares to trading on the ASX, however, due to the 1 month shareholder approval coming to an end the Company negotiated with the recipients to issue the Shares prior to reinstatement of the Company’s shares to trading on the ASX. This also resulted in the need for the Company to lodge a supplementary prospectus as well as continue working towards each of the reinstatement conditions.

2. What arrangements does SIX 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?

As ASX is aware from the Company’s Corporate Governance Statement released on 29 September 2020, the Company has a Corporate Governance Plan in place which governs the Company’s continuous disclosure policy.



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

The Company does not consider that its current arrangements are inadequate or not being enforced.

The Company notes that as part of the reinstatement of the Company's shares to the Official List, the current Board will be entirely replaced with a new Board who are committed to improved and rigorous corporate governance on behalf of the Company including, but not limited to, compliance with Listing Rule 3.19B. Further, the incoming Board will be trained by the Company Secretary in relation to their compliance obligations as set out in the Company's Corporate Governance Statement.

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

Yours sincerely

Robert Molkenthin

Company Secretary



14 December 2020

Reference: ODIN28852

Mr Robert Molkenhain
Company Secretary
Sprintex Limited
183 Mulgool Road
Malaga, Western Australia 6090

By email: robert.molkenhain@sprintex.com.au

Dear Mr Molkenhain

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

ASX refers to the following:

1. SIX's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 11 December 2020 for Mr Michael Wilson (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 Wilson's notifiable interest occurred on 28 October 2020. It appears that the Notice should have been lodged with ASX by 4 November 2020. Consequently, SIX may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Mr Wilson 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 SIX 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 SIX 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 AWST Thursday, 17 December 2020**. 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, SIX'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 SIX to request a trading halt immediately.

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

Suspension

If you are unable to respond to this letter by the time specified above, ASX will likely suspend trading in SIX's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to SIX'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 SIX'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

We reserve the right to release a copy of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Questions

If you have any questions in relation to the above, please do not hesitate to contact me.

Yours sincerely

Vanessa Nevjestic
Adviser, Listings Compliance (Perth)