



Animoca Brands Corporation Limited (ACN: 122 921 813)
C/- HLB Mann Judd (SA) Pty Ltd
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9 February 2015

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

DIRECTOR'S INTEREST NOTICES

The Company refers to your letter dated 5 February 2015 in relation to the lodgement of the Company's director's interest notices lodged 29 January 2015. In relation to your queries:

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

The Company refers to ASX Listing Rule 3.19A.1, which states the following:

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.

The Company notes that in order for Animoca Brands Corporation Ltd (the 'Company', formerly Black Fire Minerals Ltd) to comply with Chapters 1 and 2 of the ASX Listing Rules, it was required to submit a listing application to be re-admitted to the official list, amounting to an admission to the official list. Accordingly, the Company viewed the relevant date that the Company was required to lodge the notices was in fact 5 business days following the re-admission of the Company to the official list, as opposed to 5 business days from their appointment. That being the case, the Company considered the last date for lodgement for the notices was in fact 29 January 2015, rather than 5 January 2015 as you have indicated. Accordingly, the Company's position is that it did not breach the requirements of the ASX Listing Rules.

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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 has comprehensive arrangements in place with its directors to ensure it meets its obligations under listing rule 3.19A. In accordance with the Company's share trading policy, any trading in the Company securities requires approval from the board, with all trading required to be communicated immediately to the Company Secretary. In addition, at board meetings the Company considers any changes in directors' interests as a regular agenda item for discussion.

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?

Not applicable.

Yours Sincerely



Donald Stephens
Company Secretary

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5 February 2015

Mr Donald Stephens
Company Secretary
Animoca Brands Corporation Limited
c/ HLB Mann Judd (SA) Pty Ltd
169 Fullarton Road
DULWICH SA 56065

By email: donaldstepens@hlbsa.com.au

Dear Donald

Animoca Brands Corporation Limited (the "Company")

We refer to the following:

1. The Company's announcement lodged with ASX Ltd ("ASX") on 29 January 2015 regarding an initial director's interest notice for David Kim, David Brickler, Robert Yung, Richard Kuo and Yat Siu ("Appendices 3X").
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 Appendices 3X indicate David Kim, David Brickler, Robert Yung, Richard Kuo and Yat Siu were appointed directors of the Company on 24 December 2014, the Appendices 3X should have been lodged with the ASX by 5 January 2015. As the Appendices 3X were lodged on 29 January 2015 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 Appendices 3X were 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 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 9 February 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 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)

cc. *Mr Reece Boroughs*
By email: reeceboroughs@hlbsa.com.au