



11 November 2015

Ms Shannon Hong  
Senior Adviser, Listings Compliance  
ASX Compliance Pty Limited  
20 Bridge Street  
Sydney NSW 2000

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

Dear Shannon

**Appendix 3Z– Final Director's Interest Notice**

I refer to your letter of 10 November 2015 and respond as follows to the questions asked.

- 1 The Appendix was lodged late due to an inadvertent administrative oversight as a result of the responsible officer's work commitments overseas.
- 2 In accordance with the listing rule 3.19B, the Company has undertakings from each of the Directors to disclose to the Company all of the information required by the Company to give ASX completed Appendices 3X, 3Y and 3Z within the time period required under listing rule 3.19A.
- 3 The Company considers that the current arrangements are adequate and being enforced.

Yours sincerely

A handwritten signature in black ink, appearing to read "A Bond".

**Andrew Bond**  
Company Secretary

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10 November 2015

Mr Andrew Bond  
Suite 1, Level 5  
303 Coronation Drive  
Milton QLD 4064

By email:

Dear Mr Bond

**Buderim Group Limited: Appendix 3Z - Final Director's Interest Notice**

We refer to the following;

1. The Appendix 3Z lodged by the Entity with ASX on Tuesday, 10 November 2015 for Ms Margaret Patricia Walker;
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.

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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.

As the Appendix 3Z indicated that the director ceased to be a director on 28 October 2015 it appears the Appendix 3Z should have lodged with ASX by 5 November 2015. As it was lodged on 10 November 2015, it appears that there may have been a breach by the Entity 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 entities for its reporting requirements.

ASX reminds the Entity of its contract with ASX to comply with the listing rules. In the circumstances ASX considers that it is appropriate that the Entity 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*, under listing rule 18.7 we ask that you answer each of the following questions.

1. Please explain why the Appendix were lodged late.
2. What arrangements does the Entity 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 the Entity intend to take to ensure compliance with listing rule 3.19B?

Your response should be sent to me by e-mail at [Shannon.hong@asx.com.au](mailto:Shannon.hong@asx.com.au). It should not be sent to the ASX Market Announcements Office.

A response is requested as soon as possible and, in any event, not later than half an hour before the start of trading (**i.e. before 9.30 a.m. A.E.D.T.) on Thursday, 12 November 2015.**

Under listing rule 18.7A, a copy of this letter 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 about any of the above, please contact me immediately.

Yours sincerely

*[Sent electronically without signature]*

Shannon Hong

**Senior Adviser, Listings Compliance**

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