anteo diagnostics

20 September 2018

Elvis Onyura
20 Bridge Street
Sydney NSW 2000

By email: Elvis.Onyura@asx.com.au

Dear Elvis,

In response to your letter dated 18 September 2018 regarding the late lodgement of Appendix 3Y for Dr Geoffrey Cumming; we respond as follows:

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

   The Appendix was lodged late due to an administrative oversight as there was no trade initiated by Dr Cumming but rather it was due to the expiry/lapsing of options. The company while undertaking its annual review identified the oversight and immediately lodged the Appendix 3Y.

2. **What arrangements does the Company 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?**

   The Company has a policy that requires all Directors to notify the Company Secretary of any transactions involving any change in notifiable interest immediately or at the very latest within two business days after the change occurs. Changes in interests due to the lapse of options were overseen by the Company Secretary.

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 believes that the current arrangements in place are adequate in relation to directors wishing to buy, sell or exercise rights in relation to the Company's securities. However, the Company has put in place a process to ensure that any lapsing of options is included in the Company's internal corporate calendar such that any changes in Directors interests, on such occurrences, are identified.

Yours Sincerely

Julien McInally
Company Secretary

18 September 2018

Mr Julien McInally
Company Secretary
Anteo Diagnostics Limited
4/26 Brandl Street
Eight Mile Plains QLD 4113

By email

Dear Mr McInally

Anteo Diagnostics 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 on Monday, 10 September 2018 for Dr Geoffrey Cumming (the "Director's 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 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.

The Appendix 3Y indicates that a change in Director's notifiable interest occurred on 8 November 2017. It appears that the Director's Notice should have been lodged with ASX by 15 November 2017. Consequently, the Company may be in breach of Listing Rules 3.19A and/or 3.19B. It also appears the director concerned may have breached section 205G of the Corporations Act.

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 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*, under Listing Rule 18.7 we ask that you answer each of the following questions.

1. Please explain why the Appendix was lodged late.

2. What arrangements does the Company 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 Company intend to take to ensure compliance with Listing Rule 3.19B?

Your response should be sent to me by e-mail at elvis.onyura@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.S.T.) on **Friday, 21 September 2018**.

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.

Kind regards

[Sent electronically without signature]

Elvis Onyura
Senior Adviser, Listings Compliance (Sydney)