

23 February 2024

ASX Compliance
Salvador Caldwell
Adviser
Listings Compliance
ASX Customer Service Centre

By Email

Dear Sirs

RE: DataDot Technology Limited ("DDT"): Appendix 3Z – Final Director's Interest Notice Query

We refer to your above query dated 22 February and advise as follows:

1. *Please explain why DDT failed to lodge Appendix 3Z within 5 business days after Mr Raymond Carroll ceased to be a director of DDT.*

Mr Carroll retired as a Director on 27 November 2023. I was appointed Company Secretary on 27 November 2023 following the sudden resignation of the prior Company Secretary. The lodgement of the Appendix 3Z in relation to Mr Ray Carroll which was due by 4 December 2023 was inadvertently not lodged by the outgoing Company Secretary or myself during this period of changeover.

We note that Mr Carroll never held any shares in DDT, we thank you for bringing this omission to our attention and we apologise for this omission of not lodging the Appendix 3Z in the prescribed period.

2. *What arrangements does DDT 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?*

DDT has written arrangements with Directors requiring that all Directors will provide to DDT all information that DDT requires to fulfill its ASX disclosure obligations in a timely manner.

Directors individual shareholdings are reviewed and confirmed at each meeting of directors.

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

Although the arrangements set out at 2 above are considered to be adequate, since the appointment of myself as the new Company Secretary, DDT has implemented an additional board meetings agenda item to specifically consider and confirm the currency of all ASX reporting compliance.

4. *Complete Appendix 3Z and provide it to ASX for release to the market.*

See attached Appendix 3Z

If you require any additional information, please do not hesitate to contact me or our Mr Andrew Hunt.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Patrick Raper'.

Patrick Raper
Director and Company Secretary

Appendix 3Z

Final Director's Interest Notice

Information or documents not available now must be given to ASX as soon as available. Information and documents given to ASX become ASX's property and may be made public.

Introduced 30/9/2001.

Name of entity:	DataDot Technology Limited
ABN:	54 091 908 726

We (the entity) give ASX the following information under listing rule 3.19A.3 and as agent for the director for the purposes of section 205G of the Corporations Act.

Name of director	Mr Ray Carroll
Date of last notice	13 May 2019
Date that director ceased to be director	27 November 2023

Part 1 – Director's relevant interests in securities of which the director is the registered holder

In the case of a trust, this includes interests in the trust made available by the responsible entity of the trust

Note: In the case of a company, interests which come within paragraph (i) of the definition of "notifiable interest of a director" should be disclosed in this part.

Number & class of securities
Nil

+ See chapter 19 for defined terms.

Appendix 3Z

Final Director's Interest Notice

Part 2 – Director's relevant interests in securities of which the director is not the registered holder

Note: In the case of a company, interests which come within paragraph (ii) of the definition of "notifiable interest of a director" should be disclosed in this part.

In the case of a trust, this includes interests in the trust made available by the responsible entity of the trust

Name of holder & nature of interest Note: Provide details of the circumstances giving rise to the relevant interest	Number & class of securities
N/A	Nil

Part 3 – Director's interests in contracts

Detail of contract	N/A
Nature of interest	N/A
Name of registered holder (if issued securities)	N/A
No. and class of securities to which interest relates	N/A

+ See chapter 19 for defined terms.



21 February 2024

Reference: 88973

Mr Patrick Raper
Company Secretary
DataDot Technology Limited
8 Ethel Ave
Brookvale NSW 2100

By email

Dear Mr Raper

DataDot Technology Limited ('DDT'): Appendix 3Z – Final Director's Interest Notice Query

ASX refers to the following:

1. DDT's announcement lodged on the ASX Market Announcements Platform ('MAP') on 4 October 2023 which disclosed the resignation of Mr Raymond Carroll as a director of DDT effective on 27 November 2023, the date of DDT's Annual General Meeting;

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.'

DDT has failed to lodge an Appendix 3Z indicating that Mr Raymond Carroll ceased to be a director on 27 November 2023. Accordingly, it appears that DDT may have breached Listing Rules 3.19A and/or 3.19B.

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 DDT failed to lodge Appendix 3Z within 5 business days after Mr Raymond Carroll ceased to be a director of DDT.
2. What arrangements does DDT 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 DDT intend to take to ensure compliance with Listing Rule 3.19B?
4. Complete Appendix 3Z and provide it to ASX for release to the market.

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 **3:00 PM AEDT Monday, 26 February 2024**. 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, DDT'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 DDT to request a trading halt immediately.

Your response should be sent to me by e-mail at ListingsComplianceSydney@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.

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 DDT'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 DDT's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to DDT'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 DDT'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.

Yours sincerely

ASX Compliance