



SPRINTEX LIMITED
ABN: 38 106 337 599

ASX Code: SIX

7 September 2017

Mr. Jeremy Newman
Senior Adviser, Listings Compliance (Perth)
ASX Compliance Pty Limited
Level 40, Central Park
152 – 158 St Georges Terrace
PERTH WA 6000

By email: tradinghaltspert@asx.com.au

Dear Jeremy,

Response to Appendix 3Y Query – Change of Director’s Interest Notice

With reference to your letter dated 6 September 2017 in relation to the Company’s announcements lodged with ASX Ltd (“ASX”) and released on 28 August 2017 regarding change of director’s interest notices for Mr David White (“Appendices 3Y”), we advise as follows:

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

The Company is aware of its obligations under the ASX Listing Rules, including Listing Rules 3.19A and 3.19B, and takes its obligations to comply with the Listing Rules seriously. The Company advises that the Appendices 3Y in relation to Mr David White were lodged outside the required timeframe due to an administrative oversight.

The Appendices 3Y in question relate to changes in notifiable interests that occurred on 28 December 2016 and 3 January 2017. These earlier changes were noticed when the Appendix 3Y for the change in notifiable interest that occurred on 24 August 2017 were being reported. As soon as this administrative oversight was identified, the relevant information was obtained from Mr David White and the Appendices 3Y were immediately lodged.

The Company has since taken action to ensure that all future disclosures of this nature are made within the required time frames.

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?

Directors are required by the terms of their appointment, and the Company’s “Securities Trading Policy”, to advise when there are changes to any shareholdings, direct or indirect. These arrangements are intended to ensure that the Company meets its disclosure obligations under Listing Rule 3.19A. The focus of these arrangements is primarily in relation to on-market share dealings which are generally within the knowledge and control of the director.

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?

Notwithstanding this inadvertent oversight, the Company believes that the current arrangements are adequate to ensure future compliance with ASX Listing Rule 3.19B.

Yours sincerely

Robert Molkenthin
Company Secretary



6 September 2017

Mr Robert Molkenthin
Company Secretary
Sprintex Limited

Dear Mr Molkenthin

Sprintex Limited (the “Company”)

I refer to the following:

1. The Company’s announcements lodged with ASX Ltd (“ASX”) and released on Monday, 28 August 2017, regarding change of director’s interest notices for Mr David White (“Appendices 3Y”).

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) 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 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. Guidance Note 27 which states as follows.

Where a director of an entity breaches its trading policy by trading in securities during a closed period without prior written clearance, that breach will generally be a matter of public record because of the disclosures in the Appendix 3Y (Change of Director's Interest Notice) required to be lodged with ASX in relation to that trading. In this situation, to meet the standards of good governance expected of listed entities and their directors, an entity should give careful consideration to whether it ought to make an announcement to the market explaining the circumstances of the breach and what (if any) disciplinary or remedial action the entity has taken, or proposes to take, in relation to the breach.

The Appendices 3Y indicate changes in the notifiable interests of Mr White occurred on 28 December 2016 and 3 January 2017. The Appendices 3Y should have been lodged with the ASX by no later than 5 and 10 January 2017 respectively. As the Appendices 3Y were lodged on 28 August 2017, it appears that the Company may be in breach of listing rules 3.19A and/or 3.19.

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, Guidance Note 22: "Director Disclosure of Interests and Transactions in Securities - Obligations of Listed Entities" and Guidance Note 27: "Trading Policies", we ask that you answer each of the following questions.

1. Please explain why the Appendices 3Y 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 tradinghaltspert@asx.com.au, it should not be sent to the Market Announcements Office.

A response is requested as soon as possible and, in any event, not later than **3:00 pm WST on Friday, 8 September 2017.**

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]

Jeremy Newman

Senior Adviser, Listings Compliance (Perth)