

3 July 2018

ASX Compliance Pty Limited 20 Bridge Street Sydney NSW 2000 Attn: Mr Andrew Kebega

by Email: andrew.kabega@asx.com.au

Dear Mr Kabega

We acknowledge receipt of ASX's letter dated 29 June 2018 regarding the Company's late lodgement of Appendix 3Y for My Nyap Liou Gan and provide the following response to each of your questions.

- 1. The reason the appendix 3Y was lodged late was due to an administrative oversight when the unlisted options were exercised.
- 2. The Company has in place the necessary procedures and checks to ensure that such director disclosures to the ASX, including Appendix 3Y's, are completed and lodged within the time period allowed by listing rule 3.19A;
- 3. Apart from this administrative oversight, the Company considers the current arrangement to be adequate to ensure compliance with listing rule 3.19A.

Yours sincerely

Zoran Grujic Company Secretary



29 June 2018

Mr Zoran Grujic Company Secretary 8Common Limited Suite 803, Level 8, 213 Miller Street North Sydney NSW 2060

By email

Dear Mr Grujic,

8common Limited ("8CO"): Appendix 3Y – Change of Director's Interest Notices Query

ASX Limited ("ASX") refers to the following:

- 1. The Change of Director's Interest Notice lodged by CSR on the ASX Market Announcements Platform on 19 June 2018 for Mr. Nyap Liou Gan (the "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). 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 Notice indicates that changes in the notifiable interest of Mr Nyap Liou Gan occurred on 31 May 2018. It appears that the Notice should have been lodged with ASX by 6 June 2018. Consequently, 8CO may have breached 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 8CO of its contract with ASX to comply with the listing rules. In the circumstances ASX considers that it is appropriate that 8CO 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 Notice was lodged late.
- 2. What arrangements does 8CO 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 8CO intend to take to ensure compliance with listing rule 3.19B?

Your response should be sent to me by e-mail. It should <u>not</u> be sent directly to the ASX Market Announcements Office.

Your response is required as soon as reasonably possible and, in any event, by not later than 9.30am (AEST) on Wednesday, 4 July 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.

Yours sincerely,

[Sent electronically without signature]

Andrew Kabega

Senior Adviser, Listings Compliance (Sydney)