

ASX Compliance Pty Limited  
Level 40, Central Park  
152-158 St George's Terrace  
Perth WA 6000  
**Attn:** Anjuli Sinniah

By email: [Anjuli.Sinniah@asx.com.au](mailto:Anjuli.Sinniah@asx.com.au)

23 November 2015

Dear Ms. Sinniah,

**Re: Listing Rules 3.19A and 3.19B and Guideline Note 22**

I refer to your letter dated 20 November 2015 with regard to late lodgement of Appendices 3Y for our company directors.

**1 Reason for delay**

Due to staff illness, there was a delay for unforeseen circumstances and being a small company, there was a lack of back-up capacity.

**2 Arrangements in place with regard to the directors**

Please refer to item 1 above.

**3 Additional steps to ensure compliance**

I now have access to an additional resource who has company secretary experience and can provide back-up as/when required.

Yours sincerely,



Neville Walker

Chief Financial Officer and Company Secretary



20 November 2015

Neville Walker  
Company Secretary  
Advanced Braking Technology Limited  
Unit 1, 3 McDonald Street West  
OSBORNE PARK WA 6017

By email: [Neville.Walker@advancedbraking.com](mailto:Neville.Walker@advancedbraking.com)

Dear Mr Walker

**Advanced Braking Technology Limited (the “Company”)**

We refer to the following:

The Company’s announcement lodged with ASX Ltd (“ASX”) on 6 November 2015 regarding a change of director’s interest notice for David Slack, Bruce Ferguson Grey and Adam Levine (“Appendices 3Y”).

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.*

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 Companies Update dated 27 June 2008, reminding listed entities of their obligation to notify ASX within 5 business days of the notifiable interests in securities held by each director and outlining the action that ASX would take in relation to breaches of listings rules 3.19A and 3.19B.

As the Appendices 3Y indicates that a change in David Slack, Bruce Ferguson Grey and Adam Levine's notifiable interests occurred on 23 October 2015 the Appendices 3Y should have been lodged with the ASX by 30 October 2015. As the Appendices 3Y were lodged on 6 November 2015 it appears that the Company may be in breach 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 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 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 Appendices 3Y was 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 [anjuli.sinniah@asx.com.au](mailto:anjuli.sinniah@asx.com.au). It should not be sent to ASX Market Announcements.

A response is requested as soon as possible and, in any event, not later than **3:00 pm WST on Tuesday 24 November 2015**.

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]*

Anjuli Sinniah  
**Adviser, Listings Compliance (Perth)**