

16 January 2025

Response To ASX

Lisa Banh
Senior Adviser
ASX – Listings Compliance
20 Bridge Street
Sydney NSW 2000

Dear Lisa,

I refer to the attached ASX letter, dated 15 January 2025 in relation to the Appendix 3Y for Mr John Love, which was released to the ASX on 9 January 2025.

Responding to your specific questions:

1. Please confirm the date of change of Mr Love's notifiable interest as disclosed in the Appendix 3Y.

Response: 29 October 2019.

2. If the Appendix 3Y was lodged late, please:

2.1 explain the late lodgement;

Response: Pamela Love's (John Love's wife) father passed away and she acquired an interest in the APW units, following his passing. She was not aware of John Love's obligations to disclose the information. John Love only recently learned that she owned the units and within 5 business days of this information coming to his attention, an Appendix 3Y was released.

- 2.2 provide details of the current arrangements APW has 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; and

Response: APW and the directors are aware of their obligations under ASX listing rules 3.19A and 3.19B. APW's directors are informed of their obligations to release any holdings in APW. Checks are made with them every quarter.

- 2.3 if the current arrangements are inadequate or not being enforced, what additional steps does APW intend to take to ensure compliance with Listing Rule 3.19B?

Response: APW confirms its current arrangements are adequate.



AIMS Funds Management
A Member of AIMS Financial Group

We trust our explanations are sufficient and appropriate. Should you have any further queries please do not hesitate to contact me.

Regards,

A handwritten signature in black ink, appearing to read "Claud", with a long horizontal flourish extending to the right.

Claud Chaaya
Company Secretary
AIMS Fund Management Limited
Responsible Entity For the
AIMS Property Securities Fund

AIMS Fund Management Limited

ABN: 79 004 956 558 | **AFS Licence No:** 258052 | **Address:** Level 41, 259 George St, Sydney NSW 2000

Email: trust@aims.com.au | **Website:** www.aimsfunds.com.au | **Phone:** 1300 655 197

Australia | Hong Kong | Singapore



15 January 2025

Reference: 105100

Mr Claud Chaaya
Company Secretary
AIMS Property Securities Fund
Level 41, 259 George Street
Sydney NSW 2000

By email:

Dear Mr Chaaya

AIMS Property Securities Fund ('APW'): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. APW's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 9 January 2025 for Mr John Robert Love (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) 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.'

The Notice indicates that Mrs Pamela Anne Love (wife of Mr John Robert Love) "was transferred units in APW as inheritance, following the death of family member", however the date of the change was not specified in the Notice. In accordance with the Listing Rules as set out above, the Notice should be lodged with ASX no more than 5 business days after the change in a notifiable interest occurs. If the Notice was lodged late, APW may

have breached Listing Rule 3.19A and/or 3.19B. Further, if the Notice was lodged more than 14 days after the change occurred, Mr Love may have also breached section 205G of the *Corporations Act 2001* (Cth).

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 confirm the date of change of Mr Love's notifiable interest as disclosed in the Appendix 3Y.
2. If the Appendix 3Y was lodged late, please:
 - 2.1. explain the late lodgement;
 - 2.2. provide details of the current arrangements APW has 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; and
 - 2.3. if the current arrangements are inadequate or not being enforced, what additional steps does APW intend to take to ensure compliance with Listing Rule 3.19B?

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 **4:30 PM AEDT Monday, 20 January 2025**. 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, APW'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 APW to request a trading halt immediately.

Your response should be sent to ListingsComplianceSydney@asx.com.au. It should not be sent directly to the ASX Market Announcements Office. This is to allow us 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 APW'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 APW's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Kind regards

ASX Compliance



15 January 2025

Reference: 105100

Mr Claud Chaaya
Company Secretary
AIMS Property Securities Fund
Level 41, 259 George Street
Sydney NSW 2000

By email:

Dear Mr Chaaya

AIMS Property Securities Fund ('APW'): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. APW's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 9 January 2025 for Mr John Robert Love (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) 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.'

The Notice indicates that Mrs Pamela Anne Love (wife of Mr John Robert Love) "was transferred units in APW as inheritance, following the death of family member", however the date of the change was not specified in the Notice. In accordance with the Listing Rules as set out above, the Notice should be lodged with ASX no more than 5 business days after the change in a notifiable interest occurs. If the Notice was lodged late, APW may

have breached Listing Rule 3.19A and/or 3.19B. Further, if the Notice was lodged more than 14 days after the change occurred, Mr Love may have also breached section 205G of the *Corporations Act 2001* (Cth).

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 confirm the date of change of Mr Love's notifiable interest as disclosed in the Appendix 3Y.
2. If the Appendix 3Y was lodged late, please:
 - 2.1. explain the late lodgement;
 - 2.2. provide details of the current arrangements APW has 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; and
 - 2.3. if the current arrangements are inadequate or not being enforced, what additional steps does APW intend to take to ensure compliance with Listing Rule 3.19B?

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 **4:30 PM AEDT Monday, 20 January 2025**. 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, APW'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 APW to request a trading halt immediately.

Your response should be sent to ListingsComplianceSydney@asx.com.au. It should not be sent directly to the ASX Market Announcements Office. This is to allow us 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 APW'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 APW's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Kind regards

ASX Compliance