



INVENTIS LIMITED

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18 January 2024

Reference: 86835

**Adviser Listings Compliance**  
Australian Securities Exchange  
20 Bridge Street,  
Sydney NSW 2000

**Inventis Limited ('IVT'): Appendix 3Y – Change of Director's Interest Notice Query**

**RE: Request for Information**

1. Please explain why the Appendices 3Y were lodged late.  
*Response: Regrettably the lodgement deadline fell in a period of Company shutdown over this period, as a result we were late in lodging the 3Y because not only did the transactions occur during our scheduled Christmas Period Shutdown from 22/12/23 to 15/01/2024, but our legal and other advisors were also away during this period, and we were awaiting certain confirmations.*
2. What arrangements does IVT 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?  
*Response: The Standard practice at IVT is for Company Secretarial Staff to complete these documents in the first instance and where they are not able to do so, to send a direct request to the Director concerned, however as per our response to question 1 this proved to be difficult during the shutdown period.*
3. If the current arrangements are inadequate or not being enforced, what additional steps does IVT intend to take to ensure compliance with Listing Rule 3.19B?  
*Response: We sincerely regret the oversight on our behalf and in order to assure the ASX as well as our Board have recognised these particular circumstances was unusual and steps have taken place to ensure this will not occur again, we will implement an improvement to our current process addressing proper communications between the various parties should a particular transaction occur during this period where the business is shutdown. Such an improvement may include appropriate use of mobile SMS communications of phone calls between the appropriate Company Secretarial Staff, Advisors and Directors advising of the transactions, and resolving if it is possible for the Company Secretarial Staff to complete the necessary reporting requirements or if the Director is then required to carry out the reporting.*

Kind Regards

Michael Green  
Company Secretary

For personal use only



12 January 2024

Reference: 86835

Mr Michael Green  
Company Secretary  
Inventis Limited  
Unit 4, 2 Southridge Street  
Eastern Creek NSW 2066

By email

Dear Mr Green

### **Inventis Limited ('IVT'): Appendix 3Y – Change of Director's Interest Notice Query**

ASX refers to the following:

1. IVT's Appendices 3Y lodged on the ASX Market Announcements Platform ('MAP') on 11 January 2024 for Mr Anthony Mankarios and Mr Peter Bobbin (the 'Notices');
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 a change in the notifiable interest of Mr Mankarios and Mr Bobbin occurred on 29 December 2023. It appears that the Notice should have been lodged with ASX by 8 January 2024. Consequently, IVT 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 the Appendices 3Y were lodged late.
2. What arrangements does IVT 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 IVT 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 **9:00 AM AEDT Thursday, 18 January 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, IVT'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 IVT to request a trading halt immediately.

Your response should be sent to me by e-mail at [ListingsComplianceSydney@asx.com.au](mailto: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 IVT'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 IVT's securities under Listing Rule 17.3.

#### **Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to IVT'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 IVT's obligation to

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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

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ASX Compliance

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