

8 September 2021

c/-Vanessa Nevjestic  
Adviser, Listings Compliance (Perth)  
Australian Securities Exchange  
Level 40, Central Park  
152-158 St Georges Terrace  
Perth WA 6000

By email: ListingsCompliancePerth@asx.com.au

Dear Vanessa,

We refer to your letter dated 6 September 2021 regarding lodgement of QuickFee Limited ('QFE'):  
Appendix 3X – Initial Director's Interest Notice.

In response to your questions:

**1. Please explain why the Appendix 3X was lodged late.**

On 1 July 2021, Eric Lookhoff was appointed Managing Director and Chief Executive Officer of QuickFee Limited ('company'). The company has identified that due to an administrative oversight in the company secretarial function, the Appendix 3X in respect of Eric Lookhoff was not lodged within the prescribed time as required by Listing Rule 3.19A.

**2. What arrangements does QFE 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?**

The company has procedures in place under which directors are obliged to advise the company of interests on appointment and when a change takes place in their notifiable interests. Eric Lookhoff provided this information as required and neither he nor any other director were responsible for the delay in disclosing the required information.

**3. If the current arrangements are inadequate or not being enforced, what additional steps does QFE intend to take to ensure compliance with Listing Rule 3.19B?**

The company and the directors are aware of their obligations under Listing Rules 3.19A and 3.19B. The company considers its current arrangements are adequate for ensuring timely and accurate notification, it has nevertheless reviewed its procedures to ensure that it meets its disclosure obligations.

The responses to the above queries have been authorised for release by the directors.

Yours faithfully,



Simon Yeandle  
Company Secretary  
QuickFee Limited



6 September 2021

Reference: ODIN39259

Mr Simon Yeandle  
Company Secretary  
QuickFee Limited  
'4 07', 10 Century Circuit  
Baulkham Hills, New South Wales 2153

By email: [simon.yeandle@quickfee.com](mailto:simon.yeandle@quickfee.com)

Dear Mr Yeandle

**QuickFee Limited ('QFE'): Appendix 3X – Initial Director's Interest Notice Query**

ASX refers to the following:

1. QFE's Appendix 3X lodged on the ASX Market Announcements Platform ('MAP') on 6 September 2021 for Mr Eric Lookhoff (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.'*

As the Notice indicated that Mr Eric Lookhoff was appointed on 1 July 2021, it appears that the Notice should have been lodged with ASX by 8 July 2021. As the Notice was lodged on 6 September 2021, it appears that QFE may have breached listing rules 3.19A and/or 3.19B. It also appears that Mr Eric Lookhoff may have 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 explain why the Appendix 3X was lodged late.
2. What arrangements does QFE 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 QFE 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 AWST Thursday, 9 September 2021**. 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, QFE'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 QFE to request a trading halt immediately.

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

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

In responding to this letter, you should have regard to QFE'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 QFE'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**

We reserve the right to release a copy of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

### **Questions**

If you have any questions in relation to the above, please do not hesitate to contact me.

Yours sincerely

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**Vanessa Nevjestic**

Adviser, Listings Compliance (Perth)