

12 July 2018

Dawn James
Adviser Listings Compliance (Perth)
ASX Compliance Pty Ltd
Level 40 Central Park
152-158 St Georges Terrace
PERTH WA 6000

Dear Dawn

NETLINKZ LIMITED – Appendix 3X

Further to your letter to Netlinkz Limited (Company) dated 12 July 2018 in which you requested certain information regarding the late lodgment of the Appendix 3X for Xiaowen Shi we have set out our response below in relation to the questions raised in your letter (using the numbering in your letter).

1. The Appendix 3X for Xiaowen Shi was lodged late as Xiaowen Shi was overseas from 1 July 2018 until 11 July 2018.
2. The Company has in place the following processes in place to ensure that it is able to meet its disclosure obligations under ASX Listing Rule 3.19A:
 - (a) Each director is informed of the disclosure obligations which arise under ASX Listing Rule 3.19A upon their appointment.
 - (b) The Company's share registry is instructed to notify the Company Secretary of any movements in a directors interest in securities of the Company.
 - (c) The Company's Security Trading Policy requires any director wishing to trade in the Company's securities to notify the Chairman (or the Managing Director in his absence) of their intention to do so and receive notification from the Chairman or Managing Director (as the case may be) that there is no impediment to them doing so). The Company Secretary is also required to be notified of any dealing in the Company's securities.
 - (d) The Company's Security Trading Policy also requires directors to notify the Company Secretary within two business days after any dealings in the Company's securities (either personally or through a third party). This ensures that the Company is able to notify ASX of the change in the Director's or connected person's interests within the requisite time frame of no more than 5 business days after the change has occurred.
3. The Company believes its current arrangements are adequate.

Yours faithfully



Greg MacMillan
Company Secretary
Netlinkz Limited



12 July 2018

Mr Greg MacMillan

Company Secretary
Netlinkz Limited
Level 40, 161 Castlereagh Street
Sydney

NSW 2000

Dear Mr MacMillan

Netlinkz Limited: Appendix 3X – Initial Director’s Notice

We refer to the following;

1. The announcement lodged by the Entity with ASX Limited (“ASX”) on 3 July 2018 confirming the appointment of Xiaowen Shi as a director of the Entity effective 3 July 2018;
2. The Appendix 3X lodged by the Entity with ASX on 11 July 2018 for Xiaowen Shi (the “Appendix 3X”);
3. 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.

4. 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.

As the Appendix 3X indicated that the director was appointed on 3 July 2018 it appears that the Appendix 3X should have been lodged with ASX by 10 July 2018. As the Appendix 3X was lodged on 11 July 2018, it appears that the Entity 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 entities for its reporting requirements.

ASX reminds the Entity of its contract with ASX to comply with the listing rules. In the circumstances ASX considers that it is appropriate that the Entity 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 Appendix 3X were lodged late.
2. What arrangements does the Entity 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 the Entity intend to take to ensure compliance with listing rule 3.19B?

Your response should be sent to me by e-mail. It should not be sent to the ASX Market Announcements Office.

A response is requested as soon as possible and, in any event, not later than 3 pm (WST) Friday 13 July 2018.

If you have any queries or concerns about any of the above, please contact me immediately.

Further enquiries

If you have any further enquiries in relation to this letter, please do not hesitate to contact me.

Kind regards

[Sent electronically without signature]

Dawn James

Senior Adviser, Listings Compliance (Perth)

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