

22 June 2018

Mr Emerson Walker  
Adviser, Listings Compliance Perth,  
Level 40, Central Park,  
152-158 St Georges Terrace,  
Perth WA 6000

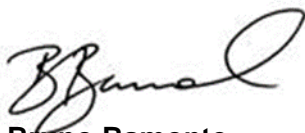
Dear Mr Walker

**Re CuDeco Limited ("the Company"): Appendix 3Z – Change of Director's Interest Notice**

We refer to your letter of 20 June 2018 regarding the late lodgement of Appendix 3Z – Change of Director's Interest Notice and advise as follows: -

- a. The appendix was lodged a week late due to an oversight caused largely by the current focus of all Directors and Senior management being on its refinancing and cash management plans, required to be completed to allow the suspension of trading of the Company's to be lifted. As soon as it was realised that the Appendix had not been lodged, the form was completed and lodged.
- b. All the Directors will be advised of this oversight, together with being provided with a summary of the key reporting obligations so that they understand all ongoing reporting obligations.
- c. I believe that the current arrangements are adequate to ensure ongoing compliance with listing rule 3.19B and other reporting obligations.

Yours Faithfully,



**Bruno Bamonte**

Company Secretary

**Head Office**

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20 June 2018

**Mr Bruno Bamonte**

Company Secretary  
CuDeco Limited  
Suite 11A, 100 Edward Street  
Brisbane QLD 4000

**By email: [bruno.bamonte@cudeco.com.au](mailto:bruno.bamonte@cudeco.com.au)**

Dear Mr Bamonte

**CuDeco (the “Entity”): Appendix 3Z – Change of Director’s Interest Notice**

We refer to the following:

1. The Appendix 3Z lodged by the Entity with ASX on 19 June 2018 for Mr Paul Keran (the “Director 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.

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3. 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 3Z indicated that the director ceased to be a director on 4 June 2018 it appears the Appendix 3Z should have been lodged with ASX by 12 June 2018. As it was lodged on 19 June 2018, it also appears that there may have been a breach by the Entity 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*, under listing rule 18.7 we ask that you answer each of the following questions.

1. Please explain why the Appendix was 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 at [emerson.walker@asx.com.au](mailto:emerson.walker@asx.com.au), with a copy to [tradinghalsperth@asx.com.au](mailto:tradinghalsperth@asx.com.au). 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 half an hour before the start of trading (ie before 9.30 a.m. A.E.S.T.) on Friday, 22 June 2018.

Under listing rule 18.7A, a copy of this letter 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 about any of the above, please contact me immediately.

Kind regards

[Sent electronically without signature]

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Emerson Walker

Adviser, Listings Compliance (Perth)