

20 November 2024

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Dear Sam

## PEET LIMITED: APPENDIX 3Z – FINAL DIRECTOR'S INTEREST NOTICE QUERY

Peet Limited (ASX:PPC) (**Peet or the Company**) refers to ASX's letter dated 18 November 2024 and provides the following responses to the specific queries set out in that letter:

### 1 Please explain why the Appendix 3Z was lodged late.

The delay in lodgement of the Appendix 3Z before 6 November 2024 was due to an internal administrative oversight by the Company, which occurred after Mr Anthony Wayne Lennon's retirement from the Board of Peet (**Board**) became effective at the conclusion of the 2024 Annual General Meeting on 30 October 2024. Upon becoming aware of the oversight, the Company lodged the Appendix 3Z with ASX.

### 2 What arrangements does PPC 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?

Peet's Corporate Governance Policies are periodically circulated to directors for their review, and who are also frequently reminded of their obligations under the ASX Listing Rules and the Corporations Act 2001 (Cth).

Every director of the Company is aware of Listing Rules 3.19A and 3.19B and their obligations to provide the necessary information to ensure the Company meets its disclosure requirements.

The steps for notification under Listing Rules 3.19A and 3.19B are as follows:

- (a) Under Peet's Guidelines for Dealing in Securities, a director is required to notify Peet's Company Secretary of any trading in Peet securities.
- (b) Following notification from a director, the Company then lodges an Appendix 3Y on ASX Market Announcements Platform, and an updated notification of the director's interests is provided to the Board at the next Board meeting. Peet's Company Secretary also updates the directors' interest register.
- (c) In the event of a director's retirement or resignation from the Board, Peet's Company Secretary is responsible for preparing all necessary documentation, including the Appendix 3Z, and lodging it with ASX within the required timeframe.

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

The Company considers the current arrangements are adequate and are being enforced. Peet has a strong history of compliance, and the late lodgement of the Appendix 3Z was an isolated incident. The Company confirms that the directors are aware of their obligations when dealing with securities in the Company.

Yours sincerely  
**PEET LIMITED**



**DOM SCAFETTA**  
**GROUP COMPANY SECRETARY**



18 November 2024

Reference: 103376

Mr Dom Scafetta  
Company Secretary  
Peet Limited

By email

Dear Mr Scafetta

**Peet Limited ('PPC'): Appendix 3Z – Final Director's Interest Notice Query**

ASX refers to the following:

1. PPC's Appendix 3Z lodged on ASX Market Announcements Platform ('MAP') on 15 November 2024 for Mr Anthony Lennon (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 Appendix 3Z indicated that the director ceased to be a director on 30 October 2024 it appears the Appendix 3Z should have been lodged with ASX by 6 November 2024. As it was lodged on 15 November 2024, it appears that PPC may have breached Listing Rules 3.19A and/or 3.19B.

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## 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 3Z was lodged late.
2. What arrangements does PPC 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 PPC 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 PM AWST Thursday, 21 November 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, PPC'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 PPC 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 PPC'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 PPC's securities under Listing Rule 17.3.

## Listing Rules 3.1 and 3.1A

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In responding to this letter, you should have regard to PPC'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 PPC'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

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ASX Compliance