

21 January 2025

Ms Melissa Kostopoulos  
Senior Adviser Listings Compliance  
ASX  
525 Collins Street, Rialto, South Tower Level 50  
Melbourne VIC 3000

**RE: Mach7 Technology Limited ('the Company'): Appendix 3Y – Change of Director's Interest Notice Query**

Dear Ms Kostopoulos,

I refer to your query letter dated 17 January 2025 (**Query Letter**) regarding the late lodgement of a Change of Director's Interest Notice for Mach7 Technology Limited director, Dr Eliot Siegel (the **Relevant Director**).

As requested in the Query Letter, we provide the following information for each of the questions contained in the Query Letter:

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

The Appendix 3Y was lodged late due to an administrative oversight resulting in the Company not receiving all required information regarding the Relevant Director's share purchase until after the deadline for lodging the Appendix 3Y. There was an unforeseen delay in the Relevant Director obtaining the required information regarding the purchase from the broker who arranged the transaction. The Appendix 3Y was completed and lodged by the Company as soon as practicable after it received all required information from the Relevant Director regarding the share purchase.

**2. What arrangements does M7T 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, as part of its onboarding of directors, entered into arrangements to facilitate compliance with Listing Rule 3.19A, including notifying the Company of share transaction on a timely basis to enable lodgement of Appendix 3Ys, and reminds directors of these requirements as and when necessary on a continuing basis.

**3. If the current arrangements are inadequate or not being enforced, what additional steps does M7T intend to take to ensure compliance with Listing Rule 3.19B?**

The Company considers that the late lodgement of the Appendix 3Y in relation to the Relevant Director was an isolated incident and is not expected to recur. The Company considers that, notwithstanding this isolated incident, its current arrangements are adequate and are enforced. Nevertheless, the Relevant Director has been counselled and other directors have been reminded of their obligation to notify the Company in a timely manner of any transactions in the Company's securities so as to enable compliance with Listing Rule 3.19B.



Yours sincerely,

A handwritten signature in black ink that reads 'A Panther'.

TONY PANTHER  
COMPANY SECRETARY

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17 January 2025

Reference: ODIN105295

Mr Tony Panther  
Company Secretary  
Mach7 Technology Limited  
c/ Vistra Offices, Level 4  
100 Albert Road  
South Melbourne, 3205

By email: Tony.Panther@vistra.com

Dear Mr Panther

**Mach7 Technology Limited ('M7T'): Appendix 3Y – Change of Director's Interest Notice Query**

ASX refers to the following:

1. M7T's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 16 January 2025 for Mr Eliot Siegel (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.'*

The Notice indicates that a change in Mr Siegel's notifiable interest occurred on 31 December 2024. It appears that the Notice should have been lodged with ASX by 8 January 2025. Consequently, M7T 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 Appendix 3Y was lodged late.
2. What arrangements does M7T 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 M7T 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 **9:30 AM AEDT Wednesday, 22 January 2025**. 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, M7T'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 M7T to request a trading halt immediately.

Your response should be sent to me by e-mail at [ListingsComplianceMelbourne@asx.com.au](mailto:ListingsComplianceMelbourne@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 M7T'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 M7T's securities under Listing Rule 17.3.

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**Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to M7T'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 M7T'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.

Regards

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ASX Compliance

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