

11 May 2025

Melissa Kostopoulos  
Compliance Adviser, Listings Compliance  
ASX Limited  
525 Collins Street, Rialto, South Tower  
[ListingsComplianceMelbourne@asx.com.au](mailto:ListingsComplianceMelbourne@asx.com.au).

Dear Melissa,

## Mayne Pharma Group Limited ('MYX' or 'Mayne Pharma'): Appendix 3Y – Change of Director's Interest Notice Query

We refer to your letter dated 7 May 2025 in relation to Mayne Pharma's Appendix 3Y lodged on 7 May 2025 for Professor Bruce Robinson, Non-Executive Director.

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

The Appendix 3Y was lodged late due to an administrative oversight. The Company acknowledges its obligations under Listing Rule 3.19A and remains committed to timely disclosure. While the Company has procedures in place to ensure compliance, on this occasion the relevant information was not received from the Director within the relevant timeframe, resulting in a delayed lodgement. The Company is reviewing its internal processes to reduce the risk of recurrence. The Company has reminded all Directors of their obligations under Listing Rule 3.19A.

**2. What arrangements does MYX 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?**

Mayne Pharma has formal agreements in place with each director, which require them to promptly notify the Company of any changes in their notifiable interests in securities to enable compliance with Listing Rule 3.19A. These agreements are supplemented by policies (including the Company's Market Disclosure Policy and Securities Trading Policy) and procedures that include regular reminders to directors of their obligations and processes for the Company Secretary to prepare and lodge required notices.

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

Mayne Pharma believes that the current arrangements with directors are adequate, however, the Company has reminded all directors of their obligations with respect to timely lodgement of Appendix 3Y notices.

Yours sincerely,



Laura Loftus  
Company Secretary  
[laura.loftus@maynepharma.com](mailto:laura.loftus@maynepharma.com)



Mayne Pharma Group Limited  
ABN 76 115 832 963  
[maynepharma.com](http://maynepharma.com)

T +61 8 8209 2666 F +61 8 8281 0284  
1538 Main North Road, Salisbury South, SA 5106 Australia  
PO Box 700, Salisbury, SA 5108 Australia



7 May 2025

Reference: 108974

Ms Laura Loftus  
Company Secretary  
Mayne Pharma Group Limited  
1538 Main North Road  
Salisbury South  
South Australia, 5106

By email: [laura.loftus@maynepharma.com](mailto:laura.loftus@maynepharma.com)

Dear Ms Loftus

**Mayne Pharma Group Limited ('MYX'): Appendix 3Y – Change of Director's Interest Notice Query**

ASX refers to the following:

1. MYX's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 7 May 2025 for Mr Bruce Robinson (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 Robinson's notifiable interest occurred on 28 February 2022. It appears that the Notice should have been lodged with ASX by 7 March 2022. Consequently, MYX may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Mr Robinson 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 3Y was lodged late.
2. What arrangements does MYX 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 MYX 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 AEST Monday, 12 May 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, MYX'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 MYX 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 MYX'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 MYX's securities under Listing Rule 17.3.

---

**Listing Rules 3.1 and 3.1A**

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

---

ASX Compliance