

12 September 2019

**By Email**

Ms Belinda Chiu  
Senior Adviser, Listings Compliance (Sydney)  
ASX Limited  
20 Bridge Street  
SYDNEY NSW 2000

ListingsComplianceSydney@asx.com.au

Dear Ms Chiu,

**Bravura Solutions Limited (Company): Appendix 3Z – Final Director's Interest Notice**

We refer to your letter dated 9 September 2019 in relation to the Appendix 3Z for Mr Brian Mitchell lodged on 9 September 2019.

On 23 August 2019, being the date of resignation of Brian Mitchell, the Company announced its FY19 results and its acquisition of Midwinter Financial Services. These announcements were significant matters which impacted the time and availability of senior management.

The Company acknowledges that the Appendix 3Z announcement was lodged with ASX outside the required time frame for such notices and notes that this was an inadvertent breach of its obligations.

Using your numbering, the Company responds as follows:

1. The Appendix 3Z was lodged late due to an internal administrative oversight. Upon being identified by the Company, the notice was lodged as soon as possible.
2. All the directors have been notified of their obligation to keep the Company informed of any changes to their interests in the Company or circumstances giving rise to a disclosure obligation under Listing Rule 3.19A within 5 business days of such change occurring.
3. The Company is satisfied that current arrangements in place are adequate to ensure compliance with the Listing Rule 3.19B.

Yours sincerely



**Martin Deda**  
Chief Financial Officer and Company Secretary



9 September 2019

Reference: ODIN06854

Mr Martin Deda  
Company Secretary  
Bravura Solutions Limited

By email: mdeda@bravurasolutions.com

Dear Mr Deda

**Bravura Solutions Limited ('BVS'): Appendix 3Z – Final Director's Interest Notice Query**

ASX refers to the following:

1. BVS' Appendix 3Z lodged on ASX Market Announcements Platform ('MAP') on 9 September 2019 for Mr Brian Mitchell (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 23 August 2019 it appears the Appendix 3Z should have been lodged with ASX by 30 August 2019. As it was lodged on 9 September 2019, it appears that BVS may have breached 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.

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ASX reminds BVS of its contract with ASX to comply with the Listing Rules. In the circumstances, BVS should make necessary arrangements to ensure it does not continue to breach the Listing Rules.

### **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 BVS 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 BVS intend to take to ensure compliance with Listing Rule 3.19B?

### **When and where to send your response**

Your response should be sent to me by e-mail at [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@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, no later than half an hour before the start of trading (i.e. before 9:30 am AEST) on 12 September 2019.

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.

### **Enquiries**

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

Kind regards

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**Belinda Chiu**  
Senior Adviser, Listings Compliance (Sydney)