

28 June 2018

Mr Anjuli Sinniah
Senior Advisor Listings Compliance (Perth)
20 Bridge Street
Sydney NSW 2000

Appendix 3Z – Final Director’s Interest Notice – Late Lodgement

I refer to the questions posed in your email of today’s date;

1. Please explain why Appendix 3Z was lodged late.
 - a. Our previous Company Secretary passed away unexpectedly while on holidays mid May, I was appointed to fill the position and the ASX was informed May 18.*
 - b. Mr Bruce Grey resigned as a Director June 19 and the ASX was informed June 20.*
 - c. I was unaware that as well as informing the ASX of Mr Grey’s resignation, I also needed to lodge Appendix 3Z.*
 - d. As I was reviewing the various ASX disclosure requirements overnight, I noted the need for Appendix 3Z and lodged first opportunity this morning.*

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?
 - a. Each Director is aware of their obligation to inform the Company of any share trading, additionally the ‘Declaration of any interests’ is an agenda item at the start of each monthly Board Meeting.*
 - b. Evidence of knowledge of, and compliance with 3.19A and 3.19B is evidenced by recent lodgements of Appendix 3X when Dagmar Parsons was appointed a Director on 24 April, and Appendix 3Y on May 14 when Mr David Slack made an on-market purchase, and Appendix 3Y on May 16 when Mr Bruce Grey made an on-market purchase.*
 - c. The current late lodgement was not the result of a failure of a Director to notify the Company of a trade, but the requirement to lodge Appendix 3Z as well as the notice of resignation.*

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?

- a. *I have now taken the opportunity to refresh my knowledge of ASX Reporting requirements and consider current arrangements to be adequate.*

Regards,

Sent electronically without signature

Graham Atkinson

Financial Controller

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28 June 2018

Mr Graham Atkinson
Company Secretary
Advanced Braking Technology Limited
19 Creative Street
WANGARA WA 6065

By email: graham.atkinson@advancedbraking.com

Advanced Braking Technology Limited (the “Entity”): Appendix 3Z – Final Director’s Interest Notice

We refer to the following;

1. The Appendix 3Z lodged by the Entity with ASX on 28 June 2018 for Bruce Grey (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.
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 19 June 2018 it appears the Appendix 3Z should have lodged with ASX by 26 June 2018. As it was lodged on 28 June 2018, it 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*, we ask that you answer each of the following questions.

1. Please explain why the Appendix 3Z 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 anjuli.sinniah@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 Monday 2 July 2018.

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

Further enquiries

If you have any further enquiries in relation to this letter, please do not hesitate to contact me.

Regards

[Sent electronically without signature]

Anjuli Sinniah

Senior Adviser, Listings Compliance (Perth)