

ASX RELEASE

4 February 2022

CHANGE OF DIRECTOR'S INTEREST NOTICE

Spenda Limited (the Company) provides the attached Change of Director's Interest Notice for Mr. Howard Digby. The Company notes that the purchase of 50,000 shares with a value of \$2,000 by Mr. Digby occurred during a blackout period where exceptional circumstances must exist, and prior written approval must be granted to trade during such periods pursuant to the Company's securities trading policy.

No such exceptional circumstances existed, and formal approval was not given for this trade due to an oversight whereby Mr. Digby incorrectly thought that the Company was no longer in a blackout period and did not submit a trade request form.

The Company and Directors are committed to meeting their obligations not to trade in Company securities at times when they are, or may be perceived to be, in possession of market sensitive information concerning the Company that is not generally available to investors. In accordance with ASX Listing Rule 12.9 and good governance principles, the Board has adopted a Securities Trading Policy which sets out blackout periods in which Directors and Key Management Personnel must not, except in exceptional circumstances, deal in securities of the Company. These blackout periods are also set out in a trading authority form required to be submitted and approved prior to trading in Company securities at any time.

The Board considers this an isolated incident for Mr. Digby. As a result of this incident the Company will further review its current practices regarding trading in Company securities. No disciplinary or remedial action will be taken by the Company, however, the Company will conduct further training and education in relation to its Securities Trading Policy and require additional notifications and reminders be provided for blackout trading periods.

The Company has in place effective procedures whereby any intended change in Directors' interest and transactions in Company securities by the Directors are notified prior to the change occurring and again following the change, to ensure that Company can meet its disclosure obligations under listing rule 3.19A and disclose any changes to ASX within 5 business days.

Authorised by:
Justyn Stedwell
Company Secretary

Appendix 3Y

Change of Director's Interest Notice

Information or documents not available now must be given to ASX as soon as available. Information and documents given to ASX become ASX's property and may be made public.

Introduced 30/09/01 Amended 01/01/11

Name of entity: SPENDA LIMITED
ACN: 099 084 143

We (the entity) give ASX the following information under listing rule 3.19A.2 and as agent for the director for the purposes of section 205G of the Corporations Act.

Name of Director	Howard Digby
Date of last notice	8 June 2021

Part 1 - Change of director's relevant interests in securities

In the case of a trust, this includes interests in the trust made available by the responsible entity of the trust

Note: In the case of a company, interests which come within paragraph (i) of the definition of "notifiable interest of a director" should be disclosed in this part.

Direct or indirect interest	Direct
Nature of indirect interest (including registered holder) Note: Provide details of the circumstances giving rise to the relevant interest.	
Date of change	31 January 2022
No. of securities held prior to change	2,916,666 Shares (Direct) 666,666 Listed Options (Direct) 7,700,000 Shares (Indirect) 4,500,000 Unlisted Options (Indirect) 1,925,000 Listed Options (Indirect)
Class	Ordinary Shares
Number acquired	50,000
Number disposed	Nil
Value/Consideration Note: If consideration is non-cash, provide details and estimated valuation	\$0.0395 per Share.

+ See chapter 19 for defined terms.

Appendix 3Y

Change of Director's Interest Notice

No. of securities held after change	2,966,666 Shares (Direct) 666,666 Listed Options (Direct) 7,700,000 Shares (Indirect) 4,500,000 Unlisted Options (Indirect) 1,925,000 Listed Options (Indirect)
Nature of change <small>Example: on-market trade, off-market trade, exercise of options, issue of securities under dividend reinvestment plan, participation in buy-back</small>	Shares bought on market.

Part 2 – Change of director's interests in contracts

Note: In the case of a company, interests which come within paragraph (ii) of the definition of "notifiable interest of a director" should be disclosed in this part.

Detail of contract	N/A
Nature of interest	
Name of registered holder (if issued securities)	
Date of change	
No. and class of securities to which interest related prior to change <small>Note: Details are only required for a contract in relation to which the interest has changed</small>	
Interest acquired	
Interest disposed	
Value/Consideration <small>Note: If consideration is non-cash, provide details and an estimated valuation</small>	
Interest after change	

Part 3 – ⁺Closed period

Were the interests in the securities or contracts detailed above traded during a ⁺closed period where prior written clearance was required?	Yes
If so, was prior written clearance provided to allow the trade to proceed during this period?	
If prior written clearance was provided, on what date was this provided?	

⁺ See chapter 19 for defined terms.