



Kresta Holdings Limited

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19 March 2014

ASX Compliance Pty Ltd  
Level 8 Exchange Plaza  
2 The Esplanade  
Perth WA 6000

Attention: Jeremy Newman

Dear Jeremy

We write in response to your letter dated 17<sup>th</sup> March 2014 in regards to the initial Directors notice for John Murphy (Appendix 3X) and the final Directors notices for Peter Abery and Kevin Eley (Appendices 3Z).

The Company has just gone through a period of significant change, and while we believe we have adequately addressed all disclosure requirements, regrettably the above mentioned disclosures were made outside the timeframes required by the ASX.

The Directors are aware of their obligations in regards to 3.19A and 3.19B, and this has been reinforced with the new Directors who have joined the Board recently. The Company's share trading policy and notification requirements support the Company's disclosure obligations for compliance with listing rule 3.19.

The company has adequate arrangements in place to ensure compliance with Listing Rule 3.19.

Yours Sincerely

A handwritten signature in blue ink, appearing to read "B Cocks", is written over the typed name.

Brendan Cocks  
Company Secretary



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17 March 2014

Mr Brendan Cocks  
Company Secretary  
Kresta Holdings Limited

By email: [bcocks@khl.com.au](mailto:bcocks@khl.com.au)

Dear Brendan

**Kresta Holdings Limited (the "Company")**

We refer to the following:

1. The Company's announcements lodged with ASX Ltd ("ASX") on 13 March 2014 regarding:
  - 1.1. An initial director's interest notice for John Murphy ("Appendix 3X"); and
  - 1.2. Final director's interest notices for Peter Abery and Kevin John Eley (together the "Appendices 3Z").
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 an 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). The entity must complete an 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 an 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 3.19A. The entity must enforce the arrangements with the director.*

4. The Companies Update dated 27 June 2008, reminding listed entities of their obligation to notify ASX within 5 business days of the notifiable interests in securities held by each director and outlining the action that ASX would take in relation to breaches of listings rules 3.19A and 3.19B.

As the Appendix 3X indicates John Murphy was appointed on 12 February 2014, the Appendix 3X should have been lodged with the ASX by 19 February 2014. Further, as the Appendices 3Z indicate Peter Abery and Kevin John Eley ceased to be directors on 28 February 2014, the Appendices 3Z should have been lodged with the ASX by 7 March 2014. As the Appendix 3X and Appendices 3Z were lodged on 13 March 2014 it appears that the Company may be in breach 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 companies for its reporting requirements.

ASX reminds the Company of its contract with ASX to comply with the listing rules. In the circumstances ASX considers that it is appropriate that the Company 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 3X and the Appendices 3Z were lodged late.
2. What arrangements does the Company have in place 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 Company intend to take to ensure compliance with listing rule 3.19B?

Your response should be sent to me by e-mail to [jeremy.newman@asx.com.au](mailto:jeremy.newman@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 **5:00 pm WST on Thursday, 20 March 2014**.

Under listing rule 18.7A, a copy of this query 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. If you have any queries or concerns, please contact me immediately.

Yours sincerely,

*[sent electronically without signature]*

Jeremy Newman

**Adviser, Listings Compliance (Perth)**

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