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16 April 2009

Response to Request for information on Appendix 3Z lodged 13 April 2009

Dear Peter

I refer to your request for information, dated 15 April 2009, regarding the late lodgement of Appendix 3Z for Mr Peter Adrian Stedwell and supply responses to your questions as follows:

- **Please explain why the Appendix 3Z was lodged late?**
Unfortunately I was overseas on leave from the 26th March through to April 13th and was visiting initially London until 31st March and then onto Syria and Turkey which can make communication difficult with Australia. I was contacted by the Company's CEO on the 31st March advising of the unfortunate death of our director Peter Stedwell and the prime focus then was on constructing an announcement to the ASX on his death. As I had only a couple of hours before boarding my flight to Syria, I had failed to remind our CEO that the Company needed to lodge an Appendix 3Z.

Before I went on leave I had instructed our CEO on how to lodge ASX announcements and the unfortunate death of one of our directors was not something that I had allowed for in my planning. The Company has only recently employed a full time Technical Manager which makes our total staff numbers only three (3) so we have limited resources in the event that some-one is on leave.

- **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?**

The Company has internal Corporate Governance procedures which are issued to new Directors on commencement and these procedures are available on the Company's main computer system as well. At each Board meeting, 'Corporate Governance' is an agenda item for discussion where such things as Director's Interests, potential announcements and other matters are regularly discussed.

The Company Secretary has the prime responsibility of ensuring that Directors are reminded of their disclosure obligations and also to ensure that the appropriate paperwork is completed within the statutory deadlines; unfortunately when a death occurs it is the responsibility of others (apart from the Director concerned) to ensure that this occurs.

- **If the current arrangements are inadequate or not being enforced, what additional steps does the Company intend to ensure compliance with listing rule 3.19B?**

I wish to highlight the fact that since my appointment of Company Secretary (1 March 2004) the Company has never been in contravention of any Listing Rules and that this late lodgement of Appendix 3Z is an exception. However, the Company agrees that it will ensure that this does not occur again by conducting further training with the CEO in the event of the Company Secretary being on leave again.

Yours faithfully



Colin Johnston
Company Secretary