

24 April 2017

Dean Litis
Principal Adviser, Listings Compliance (Melbourne)
ASX Compliance Pty Limited
20 Bridge Street
Sydney NSW 2000

By email: dean.litis@asx.com.au

Dear Dean,

Appendix 3Y – Change in Director's Interest Notice

In response to your letter dated 20 April 2017, regarding the late lodgement of a change in director's interest notice for Janette Kendall, Wellcom Group Limited (ASX: WLL), makes the following comments:

1. The Appendix 3Y was lodged late due to an inadvertent administrative oversight. The Company regrets the oversight.
2. The Company has in place formal agreements with all directors regarding the respective obligations to inform the Company of changes to their director's interests within the timeframes required by listing Rule 3.19A.
3. The Company believes that it has the necessary processes in place and will seek to ensure that all future compliance obligations will be met within the required timeframe.

Yours sincerely



Andrew Lumsden
Company Secretary



20 April 2017

Mr Andrew Lumsden
870 Lorimer Street
Port Melbourne
VICTORIA 3207

By email: andrew.lumsden@wellcom.com.au

Dear Mr Lumsden

Wellcom Group Limited (the “Entity”): Appendix 3Y – Change of Director’s Interest Notice

We refer to the following;

1. The Appendix 3Y lodged by the Entity with ASX on 7 April 2017 for Janette Anne Kendall (the “Notice”);
2. Listing rule 3.19A which relevantly requires an entity to tell ASX the following:

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. 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.

The Notice indicates that a change in Ms Kendall’s notifiable interest occurred on 1 March 2017. It appears that the Notice should have been lodged with ASX by 8 March 2017. Consequently, the Entity may be in breach of listing rules 3.19A and/or 3.19B. It also appears the directors concerned may have breached section 205G of the Corporations Act.



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*, under listing rule 18.7 we ask that you answer each of the following questions.

1. Please explain why the Notice 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 dean.litis@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 Wednesday 26 April 2017.

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.

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

Yours sincerely

[Sent electronically without signature]

Dean Litis
Principal Adviser, Listings Compliance (Melbourne)