



ALEATOR ENERGY

— L I M I T E D —

9th March 2015

Anjuli Sinniah
Adviser, Listings Compliance (Perth)
ASX Compliance Pty Limited
Level 40 Central Park
152 – 158 St Georges Terrace
PERTH WA 6000

Sent by email: Anjuli Sinniah Anjuli.Sinniah@asx.com.au

Dear Anjuli,

RESPONSE TO APPENDIX 3Y QUERY

We refer to your letter dated 6 March 2015 with respect to the subject matter and respond to your queries in the same order as raised:

1. The late lodgement of the Appendix 3Y's were merely administrative oversights and separate isolated events. The lodgement made on the 11th February 2015 did not involve any trading in company securities but related to options that had expired on 31 January 2015. This Appendix 3Y was lodged 3 business days late. The lodgement made on the 24th February 2015 involving trading in company securities was a result of an unintentional communication delay from the director concerned and an innocent misjudgement on the timing of such matters. This Appendix 3Y was lodged 2 business days late. On each occasion the timing errors were identified by the Company itself and attended to urgently thereafter.
2. The company has an active procedural policy that requires all directors to notify the company of any trading undertaken by the director in its securities. Further reinforcement to include the event that occurred in Part 1 above has been communicated to all directors and understood.
3. The company believes that the current arrangements are adequate, however it will continue to ensure reinforcement of the particular ASX listing rules at every possible opportunity to improve its internal processes.

Yours faithfully,

Ranko Matic
Company Secretary



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6 March 2015

Mr Ranko Matic
Company Secretary
Aleator Energy Limited
Unit 18,
40 St Quentin Avenue,
CLAREMONT WA 6010

By email: RMatic@perth.bentleys.com.au

Dear Ranko

Aleator Energy Limited (the "Company")

We refer to the following:

1. The Company's announcement lodged with ASX Ltd ("ASX") on 24 February 2015 regarding a change of director's interest notice for Mr Mark Rowbottam ("Appendix 3Y").

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 3.19A. 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 3Y indicates a change in Mr Mark Rowbottom's notifiable interest occurred on 13 February 2015 the Appendices 3Y should have been lodged with the ASX by 20 February 2015. As the Appendix 3Y was lodged on 24 February 2015 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 3Y was 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 anjuli.sinniah@asx.com.au. It should not be sent to ASX Market Announcements.

A response is requested as soon as possible and, in any event, not later than **3:00 pm WST on Tuesday 10 March 2015**.

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]

Anjuli Sinniah
Adviser, Listings Compliance (Perth)