

15 December 2015

Ms Anjuli Sinniah
Adviser, Listings Compliance
Level 40 Central Park
152-158 St Georges Terrace
Perth WA 6000

Anaeco Limited ABN 36 087 244 228
3 Turner Avenue, Technology Park
Bentley, Western Australia 6102
PO Box 1287, Bentley DC WA 6983
Ph: +61 8 9361 4777
Fx: +61 8 9361 4888
info@anaeco.com
www.anaeco.com

Dear Ms Sinniah,

We refer to your letter dated 15 December 2015 and respond to your questions as follows:

1. The Appendices 3Y were lodged late due to an administrative oversight when long term incentive shares were cancelled. As there was no trade by the Directors, no notification was required to be given to the Company. The notices were lodged immediately upon the oversight being discovered.
2. The Company has a policy stating that Directors must notify the Company of any trading undertaken in the securities of the Company.
3. Apart from this isolated occurrence, the Company considers its current arrangements to be adequate to ensure compliance with listing rule 3.19B.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tim Hinton'.

Tim Hinton
Company Secretary



15 December 2015

Tim Hinton
Company Secretary
3 Turner Avenue
BENTLEY WA 6102

By email: thinton@anaeco.com

Dear Tim,

Anaeco Limited (the “Company”)

We refer to the following:

The Company’s announcement lodged with ASX Ltd (“ASX”) on 14 December 2015 regarding a change of director’s interest notice for Shaun Edward Scott, Gianmario Alessio Capelli and David Andrew Lymburn (“Appendices 3Y”).

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.

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 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 Appendices 3Y indicate that a change in Shaun Edward Scott, Gianmario Alessio Capelli and David Andrew Lymburn's notifiable interest occurred on 20 November 2015 the Appendices 3Y should have been lodged with the ASX by 27 November 2015. As the Appendices 3Y were lodged on 14 December 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 Appendices 3Y 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 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 **4:00 pm WST on Wednesday 16 December 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)