



Australia China Holdings Limited

ARBN 067 993 506

28 Bangalla Road, Rose Bay, NSW, 2029, Australia.

Email: sec@aacch.com

31 August 2015

Ms Charlotte Hope
Senior Advisor
Listing Compliance (Sydney)
ASX Compliance Pty Limited

By e-mail

Dear Charlotte,

We refer to your letter dated 28 August 2015 in relation to the late lodgement of Amended Appendix 3Z (Change of Director's Interest Notice) for Mr. Cheang Hong Sang.

Our response is as follows:

1. Please explain why the Appendix was lodged late.

Appendix 3Z was lodged late due to an administrative oversight. As soon as the oversight was identified, the Appendix 3Z was lodged promptly to ASX.

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?

The Company and the Directors are aware of their obligations under Listing Rule 3.19A. The Company's policy is for all Directors to notify the Company Secretary of all transactions involving buying or selling the Company's share immediately after the transactions have occurred. Each director is made aware upon joining the Board and reminded on a regular basis of their obligations to provide the Company with details of any changes to their notifiable interest. The Company Secretary would then lodge the required notices with the ASX.

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?

Notwithstanding this inadvertent oversight, the Company believes that the current arrangements are adequate to ensure future compliance with ASX Listing Rule 3.19B.

Yours faithfully,
For and on behalf of
Australia China Holdings Limited


Stonely Sek
Company Secretary



28 August 2015

Mr Stonely Sek
Company Secretary
Australia China Holdings Limited
28 Bangalla Road,
Rose Bay,
NSW, 2029,

By email: sec@aakch.com

Dear Stonely,

Australia China Holdings Limited (the "Company") Appendix 3Z – Change of Director's Interest Notice

We refer to the following;

1. The announcement lodged by Australia China Holdings Limited Limited (the "Company") with ASX Limited ("ASX") on 22 July 2015 confirming the resignation of Mr Cheang Hong Sang as a director of the Company effective 13 July 2015;
2. The amended Appendix 3Z lodged by the Company with ASX on 18 August 2015 for Mr Cheang Hong Sang (the "Notice");
3. 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). 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.
4. 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.

5. 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 announcement and the Appendix 3Z indicated that the director ceased to be a director on 13 July 2015 it appears the Appendix 3Z should have lodged with ASX by 20 July 2015. As it was lodged on 17 August 2015, it appears that there may have been a breach by the Company 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 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 at charlotte.hope@asx.com.au. It should not be sent to the Company 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, 2 September 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 should separately address each of the questions asked. If you have any queries or concerns, please contact me immediately

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Yours sincerely,

Charlotte Hope
Senior Adviser, Listings Compliance (Sydney)