



Australia China Holdings Limited

ARBN 067 993 506

28 Bangalla Road, Rose Bay, NSW 2029, Australia

Email: sec@aakch.com

18 January, 2016

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

By e-mail

Dear Charlotte,

We refer to your letter dated 15 January 2016 in relation to the late lodgement of Appendix 3Z (Final Director's Interest Notice) for Mr. Chai Meen Foh.

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 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?

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.

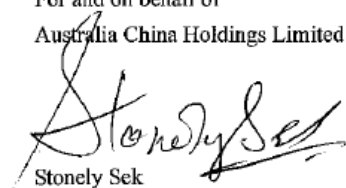
3. If the current arrangements are inadequate or not being enforced, what additional steps does the Entity intend to take to ensure compliance with listing rule 3.19B?

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

Yours faithfully,

For and on behalf of

Australia China Holdings Limited



Stonely Sek
Company Secretary



15 January 2016

Mr Stonely Sek
Level 16, China Building
29 Queen's Road Central
HONG KONG

By email: sec@aakch.com

Dear Mr Sek

Australia China Holdings Limited (the "Entity"): Appendix 3Z – Final Director's Interest Notice

We refer to the following;

1. The Appendix 3Z lodged by the Entity with ASX today for Mr Meen Foh Chai (the "Director Notice");
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 3.19.A. The entity must enforce the arrangements with the director.

As the Appendix 3Z indicated that the director ceased to be a director on 31 December 2015 it appears the Appendix 3Z should have lodged with ASX by 8 January 2016. As it was lodged on 15 January 2016, it appears that there may have been a breach by the Entity 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 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 Appendix 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 charlotte.hope@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.D.T.) on Wednesday, 20 January 2016.

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]

Charlotte Hope

Senior Adviser, Listings Compliance (Sydney)