



White Energy Company Limited
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11 April 2016

Ms Lux Wigneswaran
Principal Adviser, Listings Compliance (Sydney)

By Email: Luxmy.Wigneswaran@asx.com.au

Dear Lux

Re: App 3Y Change of Director's Interest Notice further to your letter dated 8 April 2016

With reference to your letter dated 8 April 2016 and with specific reference to your queries contained therein, we advise as follows:

1. The Company was advised by Mr Duncan of the noted trade on 4 April 2016, at which time an Appendix 3Y was immediately drafted and released to the market. The late lodgment was caused by an oversight by Mr Duncan. As advised to the market on 3 February 2016, the Company closed its Sydney office effective 31 March 2016, which also necessitated Mr Duncan moving from the Company's Sydney office to alternate private commercial premises in Sydney. During this disruptive time of closing the Sydney office and moving, there was an oversight by Mr Duncan to notify the Company within the required Listing Rule timeframe. Upon realisation of this oversight, the notification was made on the same day.
2. The Company has entered into contracts with each director relating to their requirements to notify of trading to be reported within the required Listing Rule timeframes. Upon notification by the director, the Company makes it a priority to release the required information on the same day as the notification. Upon such a release, the full board is provided with a copy of the relevant ASX release.
3. Notwithstanding the instance outlined in your letter, the Company believes the abovementioned procedures are adequate to ensure compliance with Listing Rule 3.19B. The Company in response to this letter, will also be writing to the full board advising of this event, and reminding the directors of their obligations under their contracts with the Company and their obligations under the Listing Rules for reporting trading in the Company's securities.

Yours faithfully,

David Franks
Company Secretary
White Energy Company Limited



8 April 2016

Mr David Franks
Company Secretary
White Energy Company Limited
Level 9, 20 Hunter Street
Sydney NSW 2000

By Email

Dear Mr Franks,

White Energy Company Limited (the “Company”): Appendix 3Y – Change of Director’s Interest Notice

We refer to the following.

1. The Appendix 3Y lodged by the Company with ASX on 4 April 2016 for Mr Travers Duncan (the “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 3.19.A. The entity must enforce the arrangements with the director.

The Appendix 3Y indicates that changes in Mr Duncan's notifiable interest occurred on 23 March 2016. It appears that an Appendix 3Y in respect of these changes should have been lodged with ASX by 1 April 2016. Consequently, 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 entities 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*, under listing rule 18.7 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 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 Company intend to take to ensure compliance with listing rule 3.19B?

Your response should be sent to me by e-mail at. 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 (i.e. before 9.30am AEST) on Tuesday, 12 April 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]

Lux Wigneswaran

Principal Adviser, Listings Compliance (Sydney)