

ABN: 28 008 949 219

PO Box 634 Collins Street West Melbourne VIC 8007 Australia

Dean Litis ASX Market Supervision Level 45 South Tower 525 Collins Street Melbourne VIC 3000

Dear Dean,

We refer to your letter of 5 August setting out a series of questions in relation to the above matter.

We now provide the following responses, utilising the same numbering as in your queries.

- 1. The Company has reduced its cash expenditure significantly following the sale of its main business and undertaking as approved by shareholders at the General Meeting on 29 May 2009. Further the Company has made arrangements with the purchaser of those assets for a 'Post-Completion Loan' to fund ongoing expenditure until the final 'Liquidity Event' as detailed in the transaction documents. This Liquidity Event will result in a payment to the Company of approximately AU\$3 million (gross) and should be received within the next 18 months. Based upon this information the Directors are of the view that it is not possible to conclude as you have queried.
- No. Please refer to our comments in 1 above.
- 3. With the exception of the Transaction Date, which was originally anticipated to occur in the December 2008 quarter, rather than the June 2009 quarter, the revenues and expenses were in line with the anticipated revenues and expenses.
- 4. The delay in the Transaction Date with the Purchaser caused an increase in the interest cost for the period ended 30 June 2009.
- 5. The Company believes it has complied with Listing Rules, and specifically Listing Rule 3.1 at all times.
- 6. The Company believes that it has provision in place to meet all anticipated expenses as appropriate and has a significant asset being the receivable due from the Transaction (please refer to 1 above). Further the Company has reduced its current liabilities, or is on the process of doing so, via the Post-Completion Loan and receivables that were not acquired as at the end of May 2009. The Directors therefore believe, at this point in time, that the Company is in compliance with listing rule 12.2.

If you have any further queries in relation to these matters, or others, please do not hesitate to contact us.

Yours Sincerely,

Simon Owen

Chairman



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5 August 2009

Ms Sophie Karzis Company Secretary Fulcrum Equity Limited

By email only

Dear Sophie

Fulcrum Equity Limited (the "Company")- Appendix 4C- 30 June 2009

I refer to the Company's Quarterly Report in the form of Appendix 4C for the period ended 30 June 2009 ("Appendix 4C") released to ASX Limited ("ASX") on 28 July 2009.

ASX notes that the Company has reported the following.

- 1. Receipts from customers of \$314,000
- 2. Net negative operating cash flows for the quarter of (\$1,270,000)
- 3. Cash at end of guarter of (\$37,000)
- 4. Loan facilities of \$2,207,000 of which \$1,207,000 has been used
- 5. Proceeds from the sale of the Company's major assets of \$4,476,000.

In light of the information contained in the Appendix 4C, please respond to each of the following questions.

- 1. It is possible to conclude on the basis of the information provided that if the Company were to continue to expend cash at the rate for the quarter indicated by the Appendix 4C, the Company may not have sufficient cash and financing facilities to fund its activities through the March quarter. Is this the case, or are there other factors that should be taken into account in assessing the Company's position?
- 2. Does the Company expect that in the future it will have negative operating cash flows similar to that reported in the Appendix 4C for the quarter and, if so, what steps has it taken to ensure that it has sufficient funds in order to continue its operations at that rate?
- 3. To what extent have the Company's actual revenues and expenses in the quarter, as reported in the Appendix 4C, matched the Company's anticipated revenues and expenses for that reporting period?
- 4. If the Company's actual revenues and expenses are not substantially in accordance with the Company's anticipated revenues and expenses, when did the Company become aware that its revenues and expenses would not substantially match the anticipated revenues and expenses? You

may wish to outline any circumstances that may have had an effect on the Company's revenues and expenses.

- 5. Can the Company confirm that it is in compliance with the listing rules, and in particular, listing rule 3.1?
- 6. Please comment on the Company's compliance with listing rule 12.2, with reference to the matters discussed in the note to the rule.

Listing rule 3.1

Listing rule 3.1 requires an entity to give ASX immediately any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity's securities. The exceptions to this requirement are set out in the rule.

In responding to this letter you should consult listing rule 3.1 and the guidance note titled "Continuous disclosure: listing rule 3.1".

If the information requested by this letter is information required to be given to ASX under listing rule 3.1 your obligation is to disclose the information immediately.

Your responsibility under listing rule 3.1 is not confined to, or necessarily satisfied by, answering the questions set out in this letter.

This letter and your response will be released to the market. If you have any concerns about your response being released, please contact me immediately. Your response should be sent to me by return email. It should not be sent to the Company Announcements Office.

Unless the information is required immediately under listing rule 3.1, 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. EDST) on Monday 10 August 2009.

If you have any queries regarding any of the above, please let me know.

Yours sincerely

[Sent electronically, without signature]

Dean Litis Principal Adviser Issuers (Melbourne)