



1 July 2009

ASX Limited
Mr G Valencia
Senior Advisor, Issuers Melbourne

By email only

Dear Gonzalo

Re: Wellcom Group Limited (WLL)

Thank you for your letter of the 30 June 2009.

After review of your letter I can confirm the following with regards to your query:

1. The lodgment was late due to an administrative oversight, where the settlement date was mistaken for the contract date and remitted to the Company on that basis. Subsequently the relevant notice was provided to the ASX two days late.
2. Notwithstanding the above Wellcom has sent reminders to each Director reiterating previous correspondence regarding their obligations so that the Company can meet its disclosure obligations under listing rule 3.19A.

We have further instructed the Director's that the relevant date when ensuring the timely disclosure of relevant transactions is the contract (not settlement) date, and have passed this information to their personal assistants where relevant.

3. The company takes its responsibilities to the ASX seriously. The Company has reiterated and reissued an updated agreement in the form recommended by Guidance Note 22, for execution by all Directors.

A copy of your correspondence and this reply has been circulated to all Directors for their reference. The matter will also be raised at the next Board meeting of the Company.

On behalf of the Company I apologise for the administrative oversight, and please do not hesitate to contact me should you require anything further.

Yours faithfully

A handwritten signature in black ink, appearing to read "Julian Graham". The signature is written over a vertical line that extends from the text below.

Julian Graham
Company Secretary



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30 June 2009

Mr Julian Graham
Company Secretary
Wellcom Group Limited
870 Lorimer Street
PORT MELBOURNE VIC 3207

By email only

Dear Julian

Wellcom Group 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 23 June 2009 for Mr Wayne Sidwell.
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). 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.

4. 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 listing rules 3.19A and 3.19B.

As the Appendix 3Y indicates that a change in the director's relevant interests occurred on 12 June 2009, it appears that the Director's Notice should have been lodged with ASX by 19 June 2009. 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 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 return e-mail or by facsimile on facsimile number (03) 9614 0303. 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 Friday, 3 July 2009.

Yours sincerely,

Sent electronically without signature

Gonzalo Valencia
Senior Adviser, Issuers (Melbourne)