



18 October 2010

Jenny Cutri  
Assistant Manager, Issuers Perth  
ASX Compliance Pty Ltd  
2 The Esplanade  
PERTH WA 6000

By email – jenny.cutri@asx.com.au

Jenny

I refer to your letter dated 14 October 2010 in relation to a change in Director's interest for Mr Steven Apedaile lodged on 28 September 2010 and respond as follows:

1. Mr Apedaile was buying a number of shares at the time including shares acquired on 13, 21 and 27 September. The first transaction was not notified to the Company Secretary due to an oversight.
2. The Company has a policy where all directors must inform the Company Secretary via email as soon as possible following the acquisition or sale of securities in the Company.
3. The Company believes that the companies current policies are adequate for Compliance with listing rule 3.19B, however all Directors will be reminded of their responsibilities.

Kind regards

A handwritten signature in black ink, appearing to be "Jay Stephenson". The signature is stylized with a large, circular flourish at the beginning and a long, sweeping tail.

Jay Stephenson  
**COMPANY SECRETARY**



ASX Compliance Pty Limited  
ABN 26 087 780 489  
2 The Esplanade  
Perth WA 6000

GPO Box D187  
Perth WA 6840

Telephone 61 (08) 9224 0003  
Facsimile 61 (08) 9221 2020  
Internet <http://www.asx.com.au>

14 October 2010

Mr Jay Stephenson  
Company Secretary  
Automotive Technology Group Ltd  
73 Resource Way  
MALAGA WA 6090

By email: [Jay.Stephenson@wolfstargroup.com.au](mailto:Jay.Stephenson@wolfstargroup.com.au)

Dear Jay

**Automotive Technology Group Limited ("Company")**

We refer to the following:

1. Company's announcement lodged with ASX Ltd ("ASX") on 28 September 2010 regarding a change in the director's interest for Mr Steven Apedaile ("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 an 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 an 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 an 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 listings rules 3.19A and 3.19B.

The Appendix 3Y indicates that a change in the Director's notifiable interests occurred on 13, 21 and 27 September 2010. It appears that the Director's Notice in relation to the first transaction should have been lodged with ASX by 20 September 2010. 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 3Y 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 [jenny.cutri@asx.com.au](mailto:jenny.cutri@asx.com.au) or by facsimile on facsimile number (08) 9221 2020. 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 at **7.30am WST on Wednesday 20 October 2010.**

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 must separately address each of the questions asked. If you have any queries or concerns, please contact me immediately.

Yours sincerely

*(sent by electronic mail without signature)*

Jenny Cutri  
**Assistant Manager, Issuers (Perth)**