



11 April 2011

Ms Tonia Oliveira
Adviser, Listings (Perth)
ASX Compliance Pty Limited
Level 8 Exchange Plaza
2 The Esplanade
PERTH WA 6000

By email: Tonia.oliveira@asx.com.au

Pages: 2

Dear Tonia

Pulse Health Limited (Pulse Health) – PHG
Re: Appendix 3Y – Change of Director's Interest Notice

With reference to your letter dated 11 April 2011, we apologise for the delay in providing the recent Appendix 3Y for Mr Andrew Gregory, released on 11 April 2011.

We advise that the Company takes extremely seriously its obligations under the Corporations Act and the ASX Listing Rules, including Listing Rule 3.19A and 3.19B. This is evidenced by the fact that Pulse Health voluntarily sought out and advised the market as to the reasoning for the delay in provision of the information under the noted Appendix 3Y prior to prompting or receipt of your letter noted above.

Notwithstanding this and with specific reference to your queries contained therein, we advise as follows:

1. Why were the Notices lodged late?

As advised to the market on 11 April 2011, the director was unaware of this trade occurring until after the ASX reporting requirement timeframe.

The director had purchased shares previously as advised in the Appendix 3Y announced to the ASX on 2 March 2011, with the purchase instructions not fully completed. The balance of the purchase order, being 26,650 shares, remained on the ASX CHESS Trading Platform and was executed on 1 April 2011. The director had thought that the balance of the purchase order had lapsed.

As soon as the director was made aware of the acquisition, it was reported to the Company and attached to the current Appendix 3Y lodged on 11 April 2011.

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?

The following processes are in place to ensure that it is able to meet its disclosure obligations under Listing Rule 3.19A:

(a) the Board is informed of the disclosure requirement and new Board members are made aware of the ASX requirement upon appointment. This includes each newly appointed director having been written to, advising of their Listing Rule 3.19A and 3.19B requirements, with a written confirmation of adherence to these policies from each new director received.

(b) Upon any change to a Director holding of ordinary shares and other securities made privately by a Board member (direct or indirect) or matter in relation to any contract, the Board advises the Company Secretary of such change. The Company Secretary prepares the Appendix 3Y for the Director within 48 hours for his/her review. Upon review and confirmation, the Appendix 3Y is released to the ASX upon receipt by the Company Secretary and within 5 business days;

(c) Upon any allotment of shares or other securities by the Company, the Company Secretary makes enquiries as to whether any of these allotments effects any Director holding, ensuring appropriate approvals have been obtained from Shareholders where required. Upon determination of a Change in Director Interest from the allotment in question, the Company Secretary prepares the Appendix 3Y for the Director within 48 hours for his/her review. Upon review and confirmation, the Appendix 3Y is released to the ASX upon receipt by the Company Secretary and within 5 business days;

(d) As a means of testing the above processes, the Company Secretary periodically reconciles holdings of ordinary shares and other securities in the most recent Appendix 3Y to the Company Register, and also completes a regular reconciliation in the preparation of the Full Year Accounts.

3. If the current arrangements are inadequate or are not being enforced, what additional steps does the Company intend to take to comply with Listing Rule 3.19A?

As outlined above, we apologise for the delay in providing our recent Appendix 3Y form, released on 11 April 2011. We believe our systems are adequate to fulfil our requirements under Listing Rule 3.19A as outlined above.

The director believes this was an extremely unusual situation he experienced, which resulted in the lodgement of the Appendix 3Y one day late. The director is aware of this event and will implement processes with his broker to attend to this situation in the future.

Yours sincerely



DAVID FRANKS
Joint Company Secretary



ASX Compliance Pty Limited
ABN 26 087 780 489
Level 8 Exchange Plaza
2 The Esplanade
PERTH WA 6000

GPO Box D187
PERTH WA 6840

Telephone 61 8 9224 0000
Facsimile 61 8 9221 2020
www.asx.com.au

11 April 2011

Mr David Franks
Company Secretary
Pulse Health Limited

By email: dfranks@fa.com.au

Dear David

Pulse Health Limited Appendix 3Y – Change of Director’s Interest Notice

We refer to the following:

1. The Appendix 3Y Change of Director’s Interest Notice lodged by Pulse Health Limited (the “Company”) with ASX Ltd (“ASX”) on 11 April 2011 for Mr Andrew Gregory (the “Gregory 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). 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 listings rules 3.19A and 3.19B.

As the Gregory Appendix 3Y indicates that a change in Mr Gregory's interest occurred on 1 April 2011, it appears that it should have been lodged with ASX by 8 April 2011. As the Gregory Appendix 3Y was lodged on 11 April 2011, it appears that 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 Gregory 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 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 5:00pm (WST) on Wednesday 13 April 2011.

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

Yours sincerely,



Tonia Oliveira
Adviser, Listings (Perth)