Form 604 Section 671B

Notice of change of interests of substantial holder

To: Penrice Soda Holdings Limited ("PSH")

Solvay Road, Osborne

SA 5017

ABN: 83 109 193 419

To: Australian Securities Exchange Limited

1. Details of substantial shareholder

Name: London City Equities Limited (ABN 59 003 200 664) and its related

parties and bodies corporate together ("London City Equities Limited")

give notice of a change in its relevant interests.

There were changes in the interests of the substantial holder as set out below.

The previous notice was dated 3 August 2011.

2. Previous and present voting power

The total number of votes attached to all the voting shares in the company or voting interests in the scheme that the substantial holder or an associate had a relevant interest in when last required, and when now required, to give a substantial holding notice to the company or scheme, are as follows:

Class of Securities	Previous Notice		Present Notice	
	Person's votes	Voting Power	Person's votes	Voting Power
Ordinary Shares	6,075,061	6.65%	4,752,811	5.20%

3. Change in relevant interests

Particulars of each change in. or change in the nature of, a relevant interest of the substantial holder or an associate in voting securities of the company or scheme, since the substantial holder was last required to give a substantial holding notice to the company or scheme are as follows:

Date of	Person whose	Nature of	Consideration	Class and	Person's
Change	relevant	Change	given in	Number of	Votes
	interest		relation to	Securities	
	changed		change		
Refer to	Refer to	Refer to	Refer to	Refer to	See below.
schedule 1	schedule 1	schedule 1	schedule 1	schedule 1	

4. Present relevant interests

Particulars of each relevant interest of the substantial holder in voting securites after the changes are as follows:

Holder of	Registered	Person	Nature of	Class and	Person's
relevant	holder of	entitled to be	relevant	Number of	Votes
interest	securities	registered	interest	Securities	
		as holder			
London	London City	London City	Shareholder	4,507,811	4,507,811
City	Equities Ltd	Equities Ltd	principal		
Equities					
Limited					
and					
associates					
	Capel Court	Capel Court	Trustee for	245,000	245,000
	Corporation	Corporation	PEJ Murray		
	Pty Ltd	Pty Ltd	Super Fund		
	-		(Director of		
			London City)		
Imperial			Owns 29.1%	-	-
Pacific			of London City		
Limited					
				4,752,811	4,752,811

5. Change in association

Not Applicable

6. Addresses

Name:

London City Equities Limited Mr Peter EJ Murray Capel Court Corporation Pty Ltd Imperial Pacific Limited **Address**

Level 10, 19 Pitt Street, Sydney NSW 2000 30 Esther Road, Balmoral Beach, NSW 2088 30 Esther Road, Balmoral Beach, NSW 2088 Level 10, 19 Pitt Street, Sydney NSW 2000

(Signature)

Director (Title) 24 November 201 (Date)

Schedule 1 to Form 604

Holder of relevant interest	Registered holder of securities	Nature of change	Class and Number of Securities	Consideration \$
London City	London City	Market Sales:		
Equities	Equities	03-Aug-11	(120,000)	(21,481)
Limited	Limited	08-Aug-11	(75,000)	(11,934)
		09-Aug-11	(30,000)	(5,071)
		10-Aug-11	(132,250)	(24,422)
		11-Aug-11	(90,000)	(16,111)
		16-Aug-11	(83,500)	(14,947)
		23-Aug-11	(225,000)	(35,802)
		25-Aug-11	(50,000)	(7,956)
		29-Aug-11	(26,500)	(4,348)
		23-Nov-11	(490,000)	(65,943)
			(1,322,250)	

CHECK 6,075,061 (1,322,250) 4,752,811