

23 May 2011

Mr Kobe Li  
Advisor, Listings (Melbourne)  
Australian Securities Exchange  
Level 45, Rialto South Tower  
525 Collins Street, Melbourne VIC 3000

Dear Kobe

**Re: Appendix 3Z – Final Directors’ Interest Notices (Newman and Conn)**

With reference to your letter dated 20 May 2011, we apologise for the delay in providing the recent Appendix 3Z for both Mr Chris Newman and Mr Bill Conn, released on 18 May 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.

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

1. Why were the Notices lodged late?

Both of the resignations were received on short notice. The Company was focussed on its obligations under the Corporations Act section 201A(2) and its Constitution to maintain a minimum of three directors. At the same time as the ASX was advised of the resignations, the directors were each advised by email and mail of their obligations to confirm their interests to the market as at the time of their resignation.

The following business day, with the appointment of Peter Anderson as an interim director, Mr Anderson was likewise advised of his obligations to lodge an Appendix 3X. This was lodged with ASX on the same day.

The timing of the resignations of Mr Newman and Mr Conn were unfortunate. The Board received them hours before the Easter/Anzac Day extended weekend. I understand that Mr Newman was overseas at the time. I, as Company Secretary, was also going overseas for three weeks from Easter. I am unsure of Mr Conn’s movements. The Chairman, Mr Jonathan Hutchings, was assisting in my responsibilities during this period and we communicated regularly on these matters, including collaboration on the drafting and release of announcements during this period.

Reviewing the developments on my return to work on Monday 16 May 2011, I became aware that the Appendix 3Z for each of Mr Newman and Mr Conn had not been completed or lodged as required under both the Listing Rules and Corporations Act. In the subsequent days I made several attempts to confirm holdings with both former directors. The moment these confirmations were received on Wednesday 18 May 2011 the Appendix 3Z documents were lodged with ASX, first for Mr Newman then shortly after for Mr Conn.

2. What arrangements does the Company have in place with its directors?

As Company Secretary, I review and reconfirm shareholdings and other interests with directors at least twice yearly. As a minimum, this occurs during preparation of the Annual Report and again prior to the AGM for the purpose of confirming directors' voting entitlements and exclusions if and when required.

The directors are aware that they are required to advise the Company of any changes in their shareholding or other interests in the Company. They are also aware that under our securities trading policy they are required to obtain approval before they buy or sell shares in the Company. Directors have been encouraged to provide details to the Company rather than the Company providing details to the Directors for confirmation as it is believed that this is more likely to elicit a considered and accurate response.

3. If the current arrangements are inadequate, what additional steps does the Company intend to take to ensure compliance?

The failure of the Company to lodge on time has highlighted that the arrangements did not take into consideration the possibility of communication breakdowns due to multiple parties travelling overseas at the time of such resignations. The Company will take further steps to ensure that the whereabouts of directors and I are known at all times and that we are able to be contacted and act on these matters in the appropriate timeframe.

Likewise, the failure has highlighted that resignations received on short notice create stresses on the Company's existing system. Director interests will now be placed on the agenda at each and every monthly Board meeting for confirmation. The directors will be informed that upon resignation their interests as declared at the most recent monthly Board meeting will be released to the market in an Appendix 3Z unless they specifically advise of changes.

Yours sincerely,



Nick Farrow  
Company Secretary



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20 May 2011

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By Email

Dear Nick,

**World Wide Entertainment Group Limited (the "Company")**

We refer to the following:

1. The Appendix 3Z lodged by the Company with ASX on 18 May 2011 for Mr Christopher James Newman;
2. The Appendix 3Z lodged by the Company with ASX on 18 May 2011 for Mr William John Conn;
3. Listing rule 3.19A.3 which requires an entity to tell ASX the following:

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.*

4. 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 3.19A. The entity must enforce the arrangements with the director.*

5. 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 Appendices 3Z indicates that Mr Newman ceased to be a director on 18 April 2011 and Mr Conn ceased to be a director on 21 April 2011. It appears that the Notices should have been lodged with ASX by 28 April 2011 and 3 May 2011 respectively. Consequently, the Company may be in breach of listing rules 3.19A and/or 3.19B. It also appears the directors concerned may have breached section 205G of the Corporations Act.



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 Appendices were 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 [zheng.li@asx.com.au](mailto:zheng.li@asx.com.au) 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 Wednesday, 25 May 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

*[Sent electronically without signature]*

Kobe Li  
**Adviser, Listings (Melbourne)**