



18 October 2011

Kerrie Papamihail
Assistant Manager, Listings (Perth)
ASX Compliance Pty Limited

Dear Ms Papamihail

Axiom Properties Limited (Company) – Appendix 3Y

We refer to your letter of 14 October 2011 in relation to the late lodgement of an Appendix 3Y for Mr John Howe, a Director of the Company.

The Company advises the following:

1. The share trade between Mr Howe, personally, and his pension fund, of which he is the beneficial owner, The Weathered Howe Pension Account, was recorded on 25 August 2011. The Company lodged an Appendix 3Y for this transaction on 7 October 2011.

We note that there was no change in beneficial interest in the Company's shares for Mr Howe.

There were some issues with Mr Howe's broker, resulting in uncertainty as to when the share trade would settle.

The late lodgement of the Appendix 3Y was an administrative oversight by Mr Howe on the basis that disclosure to the Company was not required as there was no change in beneficial ownership. The notification of the 25 August 2011 trade was done on 7 October 2011 when 3 other share acquisitions were notified to the ASX within the timeframe in ASX Listing Rules 3.19A and 3.19B.

2. The Company has in place the following documents and procedures to ensure that the Company is able to meet its disclosure obligations under ASX Listing Rule 3.19A and 3.19B:
 - a. Each Director entered into a Disclosure Agreement with the Company upon their appointment. The agreement set outs both the initial and ongoing disclosure obligations of the Directors, including the requirements on lodging the Appendix 3Y.
 - b. The Corporate Governance Manual, in which the Directors disclosure obligations are detailed, is reviewed and updated on an annual basis and circulated to the Directors for their information and records.
 - c. Each Director is provided with a copy of the Company's Securities Trading Policy. This policy includes requirements in relation to securities trading by the Directors. The document is circulated to the Board at least bi-annually.



- d. Regular informal and formal communications are held with all Directors by management with direct questioning of any knowledge the Director's may possess which meets the disclosure requirements of the ASX.
 - e. The Company has since advised its Directors that all trades are required to be reported even if the trade does not result in a change of beneficial ownership.
3. The Company believes that the current arrangements are adequate and does not believe any additional steps need to be taken. The Company and its Directors are and remain aware of their obligations under ASX Listing Rule 3.19A and 3.19B in relation to notifiable interests.

Yours sincerely

A handwritten signature in black ink, appearing to read "Edita Nuic".

Edita Nuic
Company Secretary
Axiom Properties Limited



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14 October 2011

Ms Edita Nuic
Company Secretary
Axiom Properties Limited
Level 18, 109 St Georges Terrace
Perth WA 6000

By email: edita@axiompl.com.au

Dear Edita

Axiom Properties Limited (the "Company")

We refer to the following:

1. The Company's announcement lodged with ASX Ltd ("ASX") on 7 October 2011 regarding a change of director's interest for Mr John Howe ("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 3.19A. 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.

It appears that the Appendix 3Y notifying the change of interest of Mr Howe should have been lodged with ASX by 1 September 2011. 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 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 **6:30am WST on Wednesday 19 October 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 must separately address each of the questions asked. If you have any queries or concerns, please contact me immediately.

Yours sincerely

Kerrie Papamihail
Assistant Manager, Listings (Perth)