

AXIOM

PROPERTIES LIMITED

21 July 2010

Jill Hewitt
Senior Advisor, Issuers (Perth)
ASX Markets Supervision Pty Ltd
Level 8, Exchange Plaza
2 The Esplanade
Perth WA 6000

By Email: jill.hewitt@asx.com.au

Dear Jill,

Axiom Properties Limited

Response to ASX query in relation to Change of Director's Interest Notice

I refer to your letter to Axiom Properties Limited dated 20 July 2010 regarding late lodgment of the Notice of Change in Directors Interest and I can confirm the following.

1. Please explain why the Appendix was lodged late.

The Appendix 3Y for Mr Ben Laurance was lodged late as a result of confusion created by the loss of staff and key staff turnover in the small team that Axiom employs. Indeed Mr. Aaron Gardiner, the original company secretary left the company in very late June 2010 and I have taken up that position at Axiom this week.

2. What arrangements does the Company have in place with its directors to ensure it is able to meet its disclosure obligations under listing rule 3.19A?

The Company has in place procedures for directors to advise any changes in their holdings when they occur as per our Corporate Governance Manual and Policy on Continuous Disclosure, both of which can be found in the corporate governance section of the Axiom website.

3. If the current arrangements are inadequate or are not being enforced, what additional steps does the company intend to take to ensure compliance with listing rule 3.19B?

Staffing levels are being addressed to ensure they are adequate to comply with the listing rules continuous disclosure obligations and continuous disclosure obligations are to be a standing item for each Directors meeting.

Please do not hesitate to contact me directly if you have any further queries on (08) 9321 4663

Yours faithfully



Gordon Hough
Company Secretary



20 July 2010

Mr A Gardiner
Company Secretary
Axiom Properties Limited
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108 St George's Terrace
PERTH WA 6000

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Internet <http://www.asx.com.au>

Email: agardiner@axiompl.com.au

Dear Aaron

Axiom Properties Limited (the "Company") – Change of Director's Interest Notice

We refer to the following;

The Appendix 3Y lodged by the Company with ASX on 20 July 2010.

1. 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 1 January 2002.
 - 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 1 January 2002 or 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.

2. 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.

3. 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 Appendix indicated that a change occurred on 6 July 2010, it appears that the Appendix should have been lodged with the ASX prior to 14 July 2010. As the Appendix was lodged on 20 July 2010, it appears that the Company may be in breach of listing rules 3.19A and/or 3.19B. It also appears that there may have been a breach of S205G of the Corporations Act by the director concerned.

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:

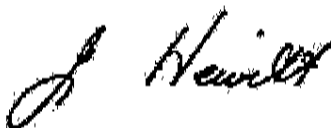
1. Please explain why the Appendix was lodged late.
2. What arrangements does the Company have in place with its directors to ensure that it is able to meet its disclosure obligations under listing rule 3.19A?
3. If the current arrangements are inadequate or not being enforced, what additional steps 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 jill.hewitt@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 (ie before 9.30 a.m. A.E.S.T.) on Friday, 23 July 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 should separately address each of the questions asked. If you have any queries or concerns, please contact me immediately.

Yours sincerely,



Jill Hewitt
Senior Adviser, Issuers (Perth)