finbar
developing better lifestyles

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Fiona Murphy
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ASX Compliance Pty Limited
Level 8 Exchange Plaza
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Perth WA 6840

31 May 2013

Dear Fiona,

**Subject: Response to ASX Appendix 3Y Query**

I refer to your letter dated 30 May 2013 in relation to the Appendix 3Y lodged for Mr John Cheak on 28 May 2013 and advise the following:

1. The Appendix 3Y was, on this occasion, lodged late due to an administrative oversight in notifying the Company of a recent change in the Director's election to participate in the Company's recent DRP, which in turn led to a small parcel of shares being automatically allotted to the Director.

2. In accordance with the requirements of the Company's Share Trading Policy, each Director is required to notify the Company Secretary within 3 Business Days of any change in their holdings.

3. The Company believes that the current practices are adequate and that the late lodgement of the 3Y in question was an unfortunate and isolated irregularity.

   However, whilst current procedures are considered sufficient, the Company Secretary has reminded all Directors of their obligations under the Company's Share Trading Policy, together with the requirements of the ASX Listing Rules

Yours faithfully

**Anthony Hewett**
Company Secretary
Finbar Group Limited

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ASX
COMPLIANCE

30 May 2013

Mr Anthony Hewett
Company Secretary
Finbar Group Ltd
Level 6, 181 Adelaide Terrace
EAST PERTH WA 6004

Dear Mr Hewett

**Finbar Group Limited (the "Company") Appendix 3Y – Change of Director's Interest Notice**

We refer to the following:

1. Appendix 3Y lodged by the Company with ASX Ltd ("ASX") on 28 May 2013 regarding a change of director's interest for Mr John Cheak (the "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 3.19.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.

The Appendix 3Y indicates that the change in the notifiable interest of the director occurred on 19 April 2013. It appears that the Appendix 3Y should have been lodged with ASX in respect of that change by 29 April 2013. 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 e-mail to fiona.murphy@asx.com.au or by facsimile on facsimile number (08) 9221 2020. It should not be sent to ASX Market Announcements Office.

A response is requested as soon as possible and, in any event, not later than **7:00 am (WST) on Tuesday, 4 June 2013.**

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

*[sent electronically without signature]*

Fiona Murphy
**Adviser, Listings Compliance (Perth)**