

Thursday, 22 January 2009

Our reference: 1271A/001/09

Mr Joel Farina  
Adviser, Issuers (Sydney)  
ASX Limited

RE: APPENDIX 3Y – CHANGE OF DIRECTOR'S INTEREST NOTICE

I refer to your letter dated 19 January 2009 relating to the late lodgement of the Appendix 3Y (Change of Director's Interest Notice) on 12 January 2009 outside the notification period of 5 days after the change had occurred and reply to your questions as follows:

1. The Director bought securities from the underwriter of the Company's recent rights issue two days before the resignation of the Company's previous Company Secretary and appointment of the Company's present Company Secretary. The previous Company Secretary had handled the rights issue and there was confusion as to where the responsibilities lay for lodging Appendix 3Y.
2. All directors must immediately notify the Company Secretary on the date any change occurs so an immediate announcement can be made to the market. If the Director utilizes the services of a broker or third party to place the order then the order must be followed through until completion or withdrawal and notify the Company Secretary immediately of the result.
3. In future all changes to director's interests must be both emailed to the Company Secretary and the Chairman. This will be followed up with a telephone communication if there has been no acknowledgement.

Please advise if you require any further information.

Yours faithfully,

*[Sent electronically, without signature]*

Claire Riquelme  
Company Secretary



ASX Markets Supervision Pty Ltd  
ABN 26 087 780 489  
20 Bridge Street  
Sydney NSW 2000  
PO Box H224  
Australia Square  
NSW 1215

19 January 2009

Telephone 61 2 9227 0441  
Facsimile 61 2 9240 7620  
www.asx.com.au

Claire Riquelme  
LongReach Group Limited  
Company Secretary

By Email

Dear Claire

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

We refer to the following:

1. The Appendix 3Y lodged by the Company with ASX Limited ("ASX") on 12 January 2009 for Peter Harrison (the "Director's Notice");
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 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 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.
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.

**Australian Securities Exchange**

Australian Stock Exchange  
Sydney Futures Exchange

Australian Clearing House  
SFE Clearing Corporation

ASX Settlement and Transfer Corporation  
Austraclear

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The Director's Notice indicates that a change in director's notifiable interest occurred on 29 December 2008. It appears that the Director's Notice should have been lodged with ASX by 6 January 2008. 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 Director's Notice 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 [joel.farina@asx.com.au](mailto:joel.farina@asx.com.au) or by facsimile on facsimile number (02) 9241 7620. 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.D.T.) on Friday, 23 January 2009.

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]*

Joel Farina  
**Adviser, Issuers (Sydney)**  
Direct Line: (02) 9227 0441