

15<sup>th</sup> October 2010

Mr Darren Collins  
ASX Compliance Pty Ltd  
Level 45 Rialto South Tower  
525 Collins Street  
Melbourne VIC 3000

Dear Darren,

**MELBOURNE**  
✉ Level 1/11 Queens Road  
Melbourne VIC 3004  
Australia  
☎ Phone: +61 3 9868 4555  
☎ Fax: +61 3 9821 4899

**SYDNEY**  
✉ Suite 5, Level 13  
327 Pitt Street  
Sydney NSW 2000  
Australia  
☎ Phone: +61 2 9283 2333  
☎ Fax: +61 2 9283 7558

✉ corporate@senetas.com  
[www.senetas.com](http://www.senetas.com)

**RE RESPONSE TO ASX APPENDIX 3Y QUERY**

I refer to your letter dated 13<sup>th</sup> October 2010 in relation to the Appendix 3Y lodged for Mr Du Bois on 5<sup>th</sup> October 2010, and provide our responses as set out in this letter. The numbered responses correspond to the questions in your letter:

1. The Appendix 3Y notice related to a grant of performance rights to Mr Du Bois at the company's annual general meeting on the 18<sup>th</sup> November 2009. The grant of performance rights to Mr Du Bois was the subject of resolution 3 in the Notice of Meeting issued by the Company and lodged with ASX on 16<sup>th</sup> October 2009. The resolution was approved by shareholders and the results of the meeting were announced to the market that day. Consequently the market was aware of the company's intention to issue performance rights to Mr Du Bois. The Appendix 3Y was lodged late due to an administrative oversight by the Company.
2. The Company does have arrangements in place with its Directors to ensure that it is able to meet its disclosure obligations under listing rule 3.19A. Changes to notifiable interests of the Company's directors must be communicated to Company's Secretary as required by the Company's Securities Trading Policy and Guidelines. The Company's Directors are required to comply with this policy.
3. The Company considers that the current arrangements are adequate, and are being enforced. The reason for the late lodgement of the Notice was not due to a lack of enforcement of these arrangements, or a lack of information provided by the Director, but due to an administrative oversight by the Company. The Company will continue to comply with listing rule 3.19B by ensuring that the Company's Directors disclose to the Company all the relevant details required by the Company to give ASX completed Notices within the time frame specified by listing rule 3.19A. Additional procedures have been put in place to ensure that changes to Directors notifiable interests at general meetings are disclosed in the form of an Appendix 3Y within the time frame specified by listing rule 3.19A.

Yours sincerely



Andrew Wilson  
Company Secretary  
Senetas Corporation Limited



ASX Compliance Pty Ltd  
ABN 26 087 780 489  
Level 45  
Rialto South Tower  
525 Collins Street  
Melbourne VIC 3000

GPO Box 1784  
Melbourne VIC 3001

Telephone 61 3 9617 8658  
Facsimile 61 3 9614 0303  
[www.asx.com.au](http://www.asx.com.au)

13 October 2010

Mr Andrew Wilson  
Company Secretary  
Senetas Corporation Limited  
Level 1  
11 Queens Road  
MELBOURNE VIC 3004

Dear Andrew

**Senetas Corporation 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 on 5 October 2010 for Mr John Hilton Du Bois.
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 listing rules 3.19A and 3.19B.

The Appendix 3Y indicates that a change in the director's relevant interest occurred on 18 November 2009. The Director's Notice was not lodged within the time frame required by the listing rules. 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 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 return e-mail 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. E.D.S.T.) on Monday, 18 October 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,

Sent electronically without signature

Darren Collins  
**Senior Adviser, Issuers (Melbourne)**