



V I C U L U S

Viculus Limited
ABN 28 074 976 828
Level 27, 101 Collins Street
MELBOURNE VIC 3000

4 February 2011

Ms Kate Kidson
Principal Adviser, Issuers (Melbourne)
ASX Compliance Pty Ltd
Level 45, 525 Collins Street, Melbourne VIC 3000

Dear Ms Kidson,

Compliance with Listing Rule 12.9 by Viculus Ltd ("the Company")

We refer to your letter dated 1 February 2011, and respond to your questions as follows:

- 1. Please explain why the Company has not lodged a trading policy with ASX.*

The Company has now lodged a complying share trading policy with ASX.

- 2. Please advise when the Company expects to lodge a trading policy with ASX in compliance with listing rules 12.9 and 12.12.*

Please refer to above answer.

Any queries in relation to this notice should be directed to David Kane on 0407 547 332.

Yours sincerely,

David Kane
Company Secretary



ASX Compliance Pty Limited
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 8625
Facsimile 61 3 9614 0303
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1 February 2011

David Kane
Company Secretary
Viculus Limited

By Email

Dear David,

Viculus Limited (the "Company") – Trading Policy Disclosure

We refer to the following.

1. Listing rule 12.9, effective from 1 January 2011, which states as follows:
An entity must have a trading policy that complies with the requirements of ASX listing rule 12.12. An entity must give its trading policy to the company announcements office for release to the market.
2. Listing rule 12.12, effective from 1 January 2011, which states as follows:
At a minimum, an entity's trading policy must include the following information:
 - 12.12.1 *The entity's closed periods.*
 - 12.12.2 *The restrictions on trading that apply to the entity's key management personnel.*
 - 12.12.3 *Any trading which is not subject to the entity's trading policy.*
 - 12.12.4 *Any exceptional circumstances in which the entity's key management personnel may be permitted to trade during a prohibited period with prior written clearance.*
 - 12.12.5 *The procedures for obtaining prior written clearance for trading under rule 12.12.4.*
3. *Guidance Note 27 – "Trading Policies"*, which was published to assist listed entities to comply with their obligations under listing rules 12.9, 12.10 and 12.12.
4. The Companies Update dated 13 August 2010, notifying listed entities of their obligation to comply with the requirements in listing rules 12.9 and 12.12, effective from 1 January 2011.
5. The Companies Update dated 9 December 2010, reminding listed entities of their obligation to comply with the requirements in listing rules 12.9 and 12.12, effective from 1 January 2011.

ASX Limited ("ASX") attaches particular importance to encouraging a consistently high standard of listed entities' disclosure in respect of trading policies.

Our records indicate that, despite the reminders mentioned above, the Company has not yet lodged with ASX a trading policy in compliance with listing rules 12.9 and 12.12.

ASX notes that the Company has been suspended since 16 September 2002. ASX reminds the Company of its contract with ASX to comply with the listing rules. This obligation is not affected by the suspension of the Company's securities from trading (see listing rule 18.6).

In the circumstances ASX requires the Company to answer the following questions:

1. Please explain why the Company has not lodged a trading policy with ASX.
2. Please advise when the Company expects to lodge a trading policy with ASX in compliance with listing rules 12.9 and 12.12.

Your response should be sent to me by e-mail at kate.kidson@asx.com.au 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 (i.e. before 9.30 a.m. A.E.D.T.) on Friday, 4 February 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 should separately address each of the questions asked.

ASX notes that the suspension in quotation of the securities of the Company will continue until the listed entity releases to the market a trading policy that is compliant with the listing rules. This is in addition to any other requirements that the Company must meet for reinstatement to quotation.

Please note that ASX Compliance has discretion not to reinstate a listed entity should it fail to comply with the listing rules, the spirit of the listing rules or be unable to disclose information to the market as requested by ASX or required by listing rule 3.1.

If you have any queries about this letter, please contact me immediately.

Yours sincerely,

Sent by electronic means without signature

Kate Kidson
Principal Adviser
Listings, Melbourne