

10th May 2011

Ms Stephanie Yong
Senior Advisor, Listings (Sydney)
ASX Compliance
20 Bridge Street
Sydney NSW 2000

Dear Stephanie

Freedom Foods Group Limited ("FNP")

I refer to your letter dated 6 May 2011, received via email and respond as follows:

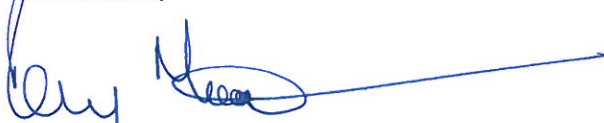
1. The Company lodged a form 604 and related director interest notices on behalf of Arrovest Pty Limited ("Arrovest") and its FNP directors on 2nd May, following receipt of notification documentation. The delay in execution and lodgement of form 604 and related director's interest's notices with the ASX was due to the Easter holiday period and the designated Arrovest representative not returning to the office until Friday 29th April 2011. The Company received the relevant executed documentation after market close on Friday 29th April 2011 and this was lodged with the ASX on the next trading day, being Monday 2nd May 2011.

We note your query re the Directors Interest notice for Mr Michael Perich in relation to the acquisition of 18,597 shares that occurred on 31 March 2011. The form 604 and related directors interests notices for Anthony Mark Perich, Ron Perich and Michael Perich was lodged with the ASX on 5th April 2011, within the 5 business day's notification period.

2. To ensure FNP abides by Listing Rule 3.19A, FNP has policies and procedures that outline to its directors obligations to disclose to the Company and to the ASX, details of its interest in securities and in contracts relevant to securities initially upon appointment and ongoing reporting obligations as a director. The Company regularly reminds directors of their obligations.
3. The Company believes that its current arrangements with directors are adequate. The Company has, however, established with Arrovest, procedures that provide for additional designated representatives of Arrovest to provide disclosures to the Company in the event of administrative delays as detailed above.

If you have any questions in relation to the above, please contact me directly.

Yours sincerely



Rory J F Macleod
Company Secretary
Freedom Foods Group Limited



6 May 2011

Rory Macleod
Company Secretary
Freedom Foods Group Limited
PO Box 2531
Taren Point NSW 2229

By email

ASX Compliance Pty Limited
ABN 26 087 780 489
20 Bridge Street
Sydney NSW 2000
PO Box H224
Australia Square
NSW 1215

Telephone 61 2 9227 0000
Facsimile 61 2 9241 7620
www.asx.com.au

Dear Rory

Freedom Foods Group Limited (the "Company")

We refer to the following;

1. The Appendices 3Y lodged by the Company with ASX Limited ("ASX") on 2 May 2011 for Mr Anthony Mark Perich, Mr Ron Perich and Mr Michael Merich (the "Appendices");
2. Listing rule 3.19A.2 which requires an entity to tell ASX the following:

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. 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 Appendices indicate that a change in the notifiable interests of Mr Anthony Mark Perich, Mr Ron Perich and Mr Michael Perich occurred on 15 April 2011. It appears that the Appendices should have been lodged with ASX by 27 April 2011. Furthermore, one of the Appendices indicates that a change in Mr Michael Perich's notifiable interests in relation to the acquisition of 18,597 shares occurred on 31 March 2011. It appears that this Appendix 3Y should have been lodged with ASX by 7 April 2011. 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 Appendices were 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 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 COB on Thursday, 12 May 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 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]

Stephanie Yong
Senior Adviser, Listings (Sydney)