

25 August 2011

Kobe Li
ASX Compliance Pty Ltd
Level 45, South Tower
525 Collins Street
MELBOURNE VIC 3000

By email: zeng.li@asx.com.au

Dear Kobe

PRAEMIUM LIMITED (THE "COMPANY")

I refer to your letter of 22 August 2011.

Using the numbering in your letter, we respond as follows:

1. The Company Secretary was on leave during the period during which the appendices should have been filed and failure to provide them to the ASX was an unfortunate oversight.
2. Each director is aware of the requirements regarding their disclosure obligations under listing rule 3.19A. Any amendments to this rule where relevant are communicated to directors. The Company's policies regarding directors responsibilities regarding trading in the Company's shares and to provide information about changes to their interests are contained in the Company's trading policy (which is published on its website: <http://www.praemium.com.au/corporate-governance.html>) and in the terms of a disclosure agreement between the company and each director which is entered into at the time of their appointment.
3. We do not consider the current arrangements to be inadequate and we are taking steps to ensure that in future all filings will be timely.

If you have any further queries, please do not hesitate to contact me.

Yours faithfully



Cathryn Nolan
Company Secretary



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 8711
Facsimile 61 3 9614 0303
www.asx.com.au

22 August 2011

Ms Cathryn Nolan
Company Secretary
Praemium Limited
Level 1, Praemium House
406 Collins Street
Melbourne VIC 3000

By Email

Dear Cathryn

Praemium Limited (the "Company")

We refer to the following;

1. The Appendix 3X lodged by the Company with ASX on 19 August 2011 for Mr Jeffery Bruce Parncutt;
2. The Appendix 3Z lodged by the Company with ASX on 19 August 2011 for Mr Arthur Naoumidis.
3. Listing rules 3.19A.1 and 3.19A.3 which require 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.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.*

4. 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.



5. 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 3X indicates that Mr Parncutt was appointed as a director on 8 August and the Appendix 3Z indicates that Mr Naoumidis ceased to be a director on 8 August 2011. It appears that the Notices should have been lodged with ASX by 15 August 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 at zheng.li@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 (**ie before 9.30 a.m. A.E.S.T.) on Thursday, 25 August 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. If you have any queries or concerns, please contact me immediately.

Yours sincerely

[Sent electronically without signature]

Kobe Li
Adviser, Listings (Melbourne)