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5 October 2011

Cameron Bill
Adviser, Listings (Sydney)
ASX Compliance Pty Ltd
20 Bridge Street
SYDNEY NSW 2000

By E-mail: cameron.bill@asx.com.au

Dear Sir

PPK Group Limited

Reference is made to your letter dated 29 September 2011 (copy attached).

The answers sought to the questions raised are detailed below.

For convenience and ease of understanding, the responses provided correspond with the same number order as the questions detailed in your letter.

Accordingly, the responses are:

1. Although notice of the lapsing of the unlisted options granted to the retired director was, in fact, provided to the market on 14 August 2007, it is accepted that formal notification of the change specific to the interests of the retired director was not made at the relevant time. The internal review process undertaken by the company has revealed that it is likely that, at the relevant time, there may have been miscommunication between the company and the retired director regarding the acquisition of the interest in respect of the shares acquired by the director resulting in the inadvertent omission to notify of the change.
2. The company has in place an agreement with each director on terms consistent with Guidance Note 22 of the Listing Rules. In addition, the acquisition of company securities by directors of the company is



regularly monitored at duly constituted board meetings as a routine agenda item.

3. In the circumstances, it is considered by the company that the current arrangements are adequate and are being enforced regarding the remaining directors.

Yours faithfully

PPK GROUP LIMITED

A handwritten signature in black ink, appearing to read 'Robert Nicholls', written in a cursive style.

Robert Nicholls

Company Secretary



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29 September 2011

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Mr Robert Nicholls
Company Secretary
PPK Group Limited
Suite 3, Level 2
668 Princes Highway
KIRRAWEE NSW 2232

By Email: robert@prestigecorp.com.au

Dear Robert,

PPK Group Limited (the "Company")

We refer to the following:

1. The Appendix 3Y lodged by the Company with ASX today for Mr Colin Francis Ryan;
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) including whether the change occurred during a closed period where prior written clearance was required and, if so, whether prior written clearance was provided. 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.

The Appendix 3Y indicates that changes in Mr Ryan's notifiable interest occurred on 14 August 2007 and 29 March 2010. It appears that an Appendix 3Y should have been lodged with ASX by 21 August 2007 and 7 April 2010 with respect to the changes respectively. Consequently, the Company may be in breach of listing rules 3.19A and/or 3.19B. It also appears the director 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 email to cameron.bill@asx.com.au. 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.S.T.) on Thursday, 6 October 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



Cameron Bill
Adviser, Listings (Sydney)