



7 February 2013

Anthony Ingegneri
Adviser, Listings Compliance
ASX Compliance Pty Limited
20 Bridge Street
Sydney
2000

Response to ASX letter dated 6 February 2013

Dear Anthony

Further to the letter dated 6 February 2013 the company's response is set out below:

1. As the company trades through CDIs and has ordinary shares on issue, the nature of transfer forms differ depending on the nature of the type of security being transferred and whether or not the transfer is through a broker sponsored account. Prior to completion of this share transaction, revised transfer forms were required to be submitted by the seller and purchaser as some parcels of shares were through broker nominated accounts and others directly with the transfer secretaries. In addition, the transfer secretaries also required additional supporting documents. The seller and buyer were therefore uncertain as to the timing of the transfer of these shares. The company undertook a regular review of the transfer records to ascertain the date of completion of the transaction. On the review of the trades of the 10 days in January 2013 the company noted the trades had been executed and lodged the 3Y.
2. The company monitors details of share transfers disclosed by its transfer secretaries.
3. In addition to 2 above, to ensure there is no re-occurrence of this breach of the listing rules the company will make the major shareholders aware that any future transfers need to be disclosed to the company within 3 days of these transactions being completed. The company will also explain to directors the transfer documentation and process required for transfer of CDIs and ordinary shares.

Yours sincerely,

[Sent electronically without signature]

Mark Nielsen
Chief Financial Officer



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6 February 2013

Mark Nielsen
Astron Corporation Limited
Level 29
2 Chifley Square
Sydney NSW 2000

Dear Mark,

Astron Corporation Limited (the "Company")

We refer to the following:

1. The Appendix 3Y lodged by the Company with ASX Limited ("ASX") on 5 February 2013 for Alexander Brown (the "Notice").
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) 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. 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 Notice indicates that a change in Alexander Brown's notifiable interest occurred on 21 January 2013. It appears that Notice should have been lodged with ASX by 29 January 2013. 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 Notice 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 e-mail at anthony.ingegneri@asx.com.au or by facsimile on facsimile number **(02) 9241 7620**. It should not be sent to the ASX Market Announcements.

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 Monday, 11 February 2013.

Under listing rule 18.7A, a copy of this query and your response may 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]

Anthony Ingegneri
Adviser, Listings Compliance (Sydney)